



Planning for Better Lives, Better Business

Submission to the draft First Revision to the National Planning Framework

September 2024

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Key messages

Population and housing targets must not be a ceiling for growth and ambition:

Targets set out in the revised NPF, which are to be reflected at regional, metropolitan or local levels must be the baseline or reference point. They should not be a cap on growth. There must be consistency and clarity across all growth projections under the NPF, including specific targets for metropolitan areas, city areas, city & suburbs etc.

Balanced regional development allows for growth: Targets should not restrict growth in any region. No region or metropolitan area should have its population growth reduced because of the revised NPF. Targets should be adjusted to respond to meeting short-term objectives to 2030 and then medium-term out to 2040.

Balanced regional development must address enterprise and employment, alongside population and housing targets: Ambitious investment in the regions through the NDP is required to address regional imbalances. One of the most effective means of stimulating regional economies is by investing in infrastructure including housing, education, transport, broadband, health and making urban centres vibrant and attractive places to work and live.

Establish a firm commitment to effective regional development: Regional growth targets should address enterprise and employment, alongside population and housing requirements. In setting targets for future growth of regions, the revised NPF growth forecasts must not cap or limit the potential for growth of each region.

Include pent up demand in the housing targets: Incorporating pent up demand into housing targets is both necessary and just. Such demand is likely to push up targets for 2023-2030 significantly. The ESRI projections do not include pent-up demand in the housing market that has accrued in recent years (e.g. up to 256,000 homes relative to our existing population).

Plan for the delivery of 60,000 homes per annum: To date, the NPF has proven too rigid in its approach to housing, prioritising regional/local apportionment of targets over delivery of housing upfront (e.g. to 2030). Increased housing targets appear to be backloaded. Population and housing

targets (national, regional, metropolitan and local) must be the baseline, not a ceiling for growth and ambition. Whilst differing population assumptions will have a substantial impact on targets over the medium-term, it would be reasonable to plan for delivery capacity of around 60,000 homes annually to 2040.

A changing household and tenure mix: The revised NPF must account for the required change in household mix and tenure. We need the right mix of housing in the right areas, in accordance with suitable and sustainable development practices. It is important that the county's housing policy adequately accounts for the expected demographic changes that will impact the housing stock and mix required over the coming years. A holistic view of housing is required, allowing for an appropriate mix of location, type, tenure, and accommodation. Students, young professionals, families, and an older population all have different housing needs.

Changes in the average household size: The demand for homes is also driven by changes in the average household size. This must be clearly recognised in the revised NPF because of the impact it will have through the local development plans in terms of strategic housing decisions.

Promoting infrastructure-led development: Transport-oriented development (TOD) is recognised as core to securing compact and sustainable growth in the revised NPF. It must not be mistaken for broader infrastructure-led development or as the singular basis of growth planning. Compact growth objectives will also require the delivery of new or upgraded critical and underpinning infrastructure such as water and wastewater services. There should be no assumption the provision of the necessary underpinning infrastructure can be backfilled into TOD locations.

Delivery of critical and underpinning infrastructure should be a National Strategic Objective: Investment in, and delivery of, critical infrastructure is a key interdependency for the delivery of new homes and jobs, and therefore should be stitched into the revised NPF. Delivering critical infrastructure should be a stand-alone goal as it underpins all NPF objectives.

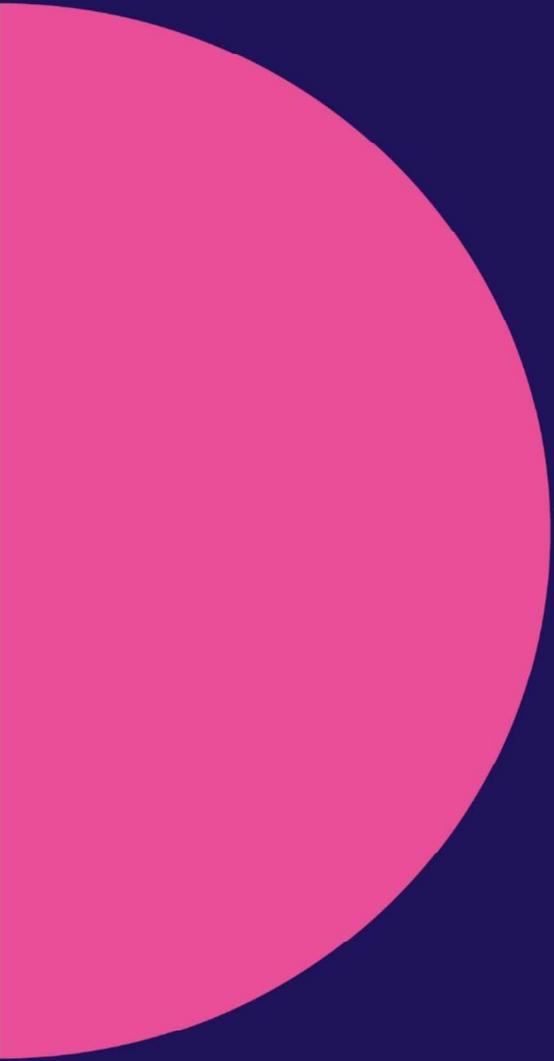
Compact growth targets should address enterprise and employment, alongside population and housing requirements: Population growth tends to follow employment growth. The revised NPF must provide for an adequate supply of zoned land for industrial activity, which may not be suitable for the

intended mixed-use and higher density urban areas, which is not currently being considered due to the focus on compact urban growth.

The revised NPF should include a rolling review mechanism: The NPF objectives and outcomes must be monitored and evaluated throughout the plan's lifespan, and consideration given to solutions that lift barriers to critical infrastructure delivery. Performance monitoring and corrective measures must not be confined to the periodic reviews set out in legislation.

Build in fail-safe measures into the NPF implementation strategy: It should be noted that the full suite of legislation and adjoining policy framework promised back in 2018 to enable the delivery of key objectives are still not yet in place. The revised NPF has clearly identified the Residential Zoned Land Tax (RZLT) as central to the delivery of serviceable development land, yet the RZLT's ability to realise this objective is unlikely given the scheme's current structure. The NPF also identifies the Land Value Sharing proposals along with Urban Development Zones as key to meeting its compact growth targets. However, there is no legislative basis for Land Value Sharing, and UDZs will not deliver large scale development in the short term and will require additional policy and fiscal levers.

Review the NDP to align with the revised NPF: An aligned NDP with a revised NPF should deliver a comprehensive programme of well-prioritised infrastructure investment to underpin long-term sustainable growth. It must prioritise strategic projects of national importance, which underpin economic growth, sustainable development, and contribute to our climate targets. It should be accompanied by a commitment to accelerated project delivery through changes to public procurement, funding approaches, planning, compliance processes and project delivery mechanisms. Finally, objectives set out in the revised NPF will require accessing innovative and diversified funding streams, including strategic utilisation of EU funding sources, enhanced engagement with the European Investment Bank, a pipeline of non-exchequer funding of infrastructure, and developing new models (e.g. City Deals) to fund urban transformation. The URDF and RRDF funding streams will not be enough on their own.



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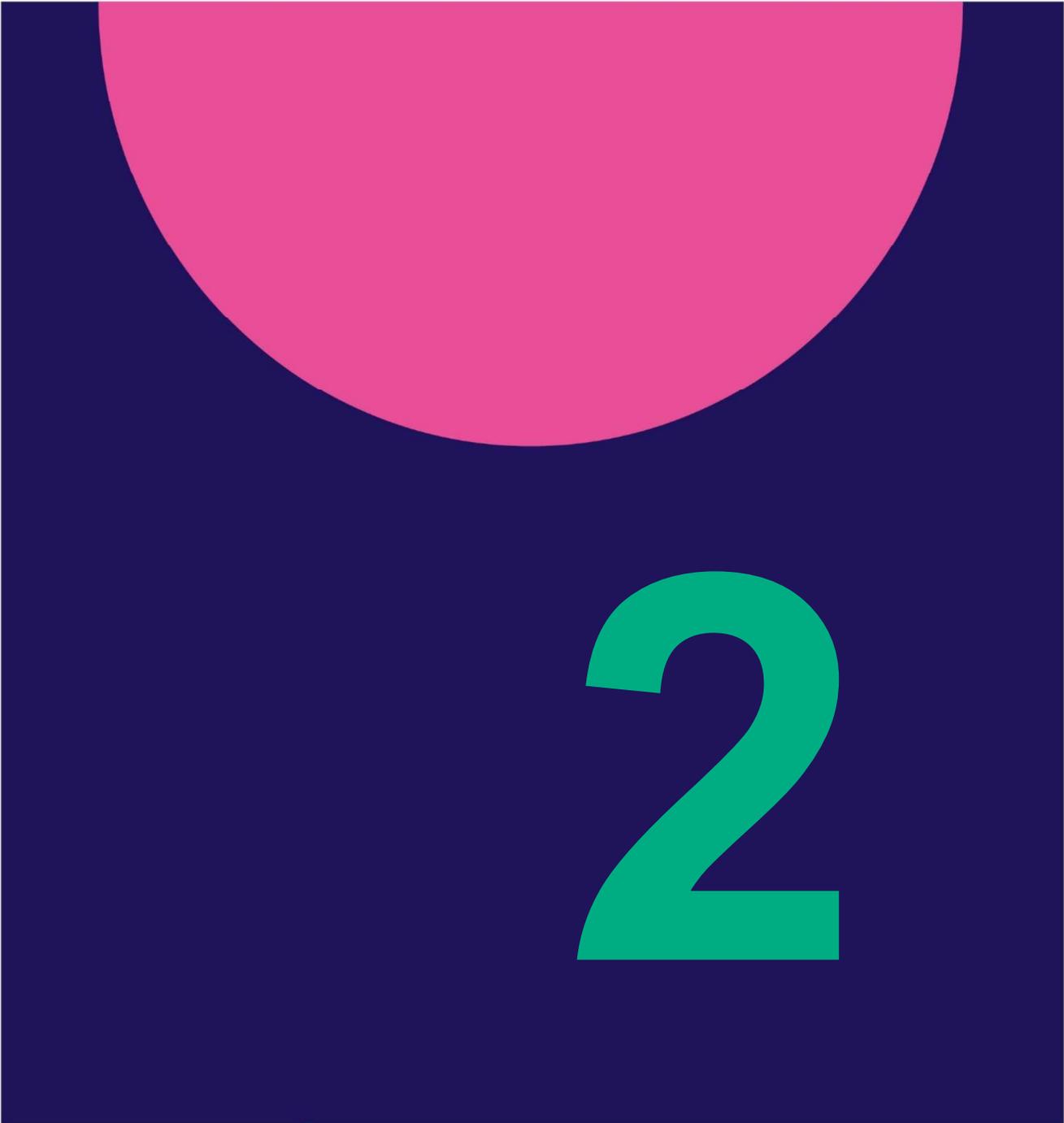
Introduction

Introduction

Ibec welcomed the publication of the NPF in 2018, and called for its implementation at regional, metropolitan, and local levels. We have used it to frame our response to the mid-term review of the National Development Plan (NDP) in 2021. It is important that the future development of our country is infrastructure-led. Our members placed high priority on the development and delivery of a viable successor to the defunct National Spatial Strategy. A more coherent planning system is vital to sustain our economic and social progress as the country faces new up to new challenges.

Ibec was actively engaged over the three years leading up to its publication. This involved a series of stakeholder workshops, hosting our own regional meetings, and was supplemented by bilateral meetings. We also partook in the NPF Advisory Group to the Cross-Departmental Steering Group. Submissions were made on the NPF Issues Paper and on the draft NPF. We also participated throughout the process of developing each of three Regional Spatial and Economic Strategies (RSEs) and have made submissions incorporating aspects of the NPF to inform the preparation of various development plans.

Ibec has prepared this submission to the *Draft First Revision to the National Planning Framework*, which addresses the views of business on the existing adopted strategy approach; the implementation of the NPF to date, at national, regional, metropolitan, and local level; and the changing policy context. It follows on from our submission in October 2023 to the Revised NPF Issues Paper: First Revision to the National Planning Framework. This response has also been informed by our participation on the Planning Advisory Forum, as well as briefings provided on the NPF by officials from the Department of Housing, Local Government and Heritage to Ibec member committees. It has been structured to address the proposed changes contained in the revised NPF.



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Discussion

Draft First Revision to the National Planning Framework

Vision

Setting out the vision and making the vision a reality

Ireland must offer people good living and working conditions to sustain economic success and remain attractive to local and global mobile talent pools. Following a period of economic recession and under-investment, severe problems have emerged in terms of housing affordability and supply, rising congestion, and inadequate provision of education and healthcare. The revision of the National Planning Framework (NPF) must be viewed in the context of making Ireland a better place to live and work by addressing the challenges around the country's burgeoning capacity constraints.

The demographic projections underpinning the NPF need to be far more ambitious to economic potential and population growth. Quite simply, we must definitively, not 'roughly', plan for more than one million extra people living in Ireland by 2040 over 2022 levels. The NPF was originally based on a projected increase in population of around one million people by 2040 over 2016 levels. The total population as of Census 2022 has reached around 44% of the total project's growth by 2040 across the country. Thus, in the first third of the 24-year projection period close to half of all the estimated population growth has already occurred. This rises to 55% in the Border region and 67% in the Midlands.

Our overall concern with the NPF is that the demographic projections underpinning it are not ambitious enough. The revised NPF needs to be far more ambitious in terms of population growth. The implications of being too conservative with the national population forecasts should not be underestimated. Conservative population projections fundamentally undermine the national strategic objectives set out in the revised NPF. Providing for a higher growth scenario could enable a better balancing for growth projections between Dublin and the regions. Ireland's ability to respond to current and future capacity pressures in housing and other areas is the single biggest threat to our competitiveness and economic wellbeing. Using narrow assumptions in terms of population growth will only continue to

exacerbate the constraints in terms of housing, infrastructure, and services across the country.

The NDP must be reviewed following the revision of the NPF. Whilst the mid-term review of the NDP only took place in 2021, factors under consideration in the revised NPF must be reflected in the national infrastructure plan. The two plans must remain aligned under Project Ireland 2040 to achieve infrastructure-led development. The priorities for the remaining timeframe of the NDP out to 2030 therefore need to reflect changes in the revised NPF. Challenges associated with infrastructure delivery must be dealt. Planned growth projections are dependent on the delivery of critical infrastructure, which is also fundamental to achieving balanced regional development.

The performance of the NPF over its lifetime must be closely monitored, with a specific focus on local and regional performance. It should be accompanied by a clear statement on how it will be translated to city and county development plans via the RSES process. It is being proposed through the Planning and Development Bill, 2023 that the NPF will be reviewed after ten years (i.e. two census cycles plus one year) as well as the planned move to ten-year development plans. Ongoing performance monitoring should permit corrective action or amendments to the NPF and other plans outside of scheduled periodic reviews.

The NPF was based on assumptions of total employment growth in the country of 660,000 jobs between 2016 and 2040. Between 2016 and Q4 2023 employment has in fact grown by 691,000 jobs, 105% of the 2016 to 2040 forecast. Across regions there is some variance with the total employment growth in the Northern and Western region growing by 63% of its 2040 target in the first third of the forecast period, whereas both the Southern (102%) and Eastern and Midlands (123%) regions outstripped forecast employment growth for the whole 2016 to 2040 period within the first six years of the NPF.

Region	2016	2023Q4	2040 forecast	Percentage of 2040 growth already achieved by 2022
State	2,015.0	2706.4	2,673.7	105%
Northern and Western	381.9	465.8	515.3	63%
Southern	656.8	884.6	879.2	102%
Eastern and Midland	982.5	1356.0	1,287.0	123%
Dublin	623.7	800.7	795.9	103%

The employment forecasts require major attention and their underlying drivers, with two regions by the end of 2023 already well more than their forecast levels for 2040. However, it is disappointing to note that it is proposed to simply delete reference to the original total employment projection of 660,000 by 2040 and not to revise the forecast.

Effective regional development

Realising ambition and potential

The two core objectives to deliver balanced regional development are retained (city focussed growth and compact growth) in the revised NPF. This includes a focus on key regional centres and towns. It should be noted in the revised NPF that stronger and ambitious targets for compact growth must be over the longer-term and set the overall vision beyond 2040. This is due to the delivery challenges, cost, viability issues, and realistic longer timelines with brownfield development and urban infill. Targets for compact growth must also be led by, and informed by, infrastructure development.

Overview of the NPF strategy

Ireland's three regions

- Strategically important cross-border economic and spatial development initiatives must be supported by the revised NPF such as the North-West City Region and the Dublin-Belfast Economic Corridor.
- Regional and compact growth must be infrastructure-led.
- Smart specialisation is an important mechanism for unlocking the growth potential of Ireland's regions by addressing imbalances and underperformances and supporting the development of existing and emerging industry clusters.

Ireland's capital

- Growth targets should extend to the wider Dublin metropolitan area.
 - Any development within the Dublin and suburbs would be brownfield by default, irrespective of the NPF.
 - Underpinning infrastructure needs to be in place to sustain its current and future population.
-

Ireland's cities

- The revised NPF sufficiently prioritises the reimagining and revitalisation of our town and city centres.
- There is no policy akin to the 'town centre first' for Irish cities, which should address city vibrancy.
- Cities are also incubators of social change, and the five metropolitan areas must adopt an inclusive approach to enhance their resilience.
- Retail centres and traditional hubs of the experience economy clustered close to employment centres are now faced with competition from local experiences or neighbouring centres closer to home.
- Hybrid and/or remote and digitalisation of the economy present challenges to city centres (e.g. encouraging 'reverse commuting', changed shopping habits) and shifting patterns of interaction with town centres outside of traditional commuting hours (e.g. weekends, later in the day etc).

Ireland's rural fabric

- Stimulate rural economies is by investing in infrastructure.
- Digitalisation increasingly is playing a key role in the exchange of goods and services, accessing public and essential services, as well as sustaining new ways of working, which many rural communities will only enjoy with the roll-out of the National Broadband Plan.
- Remote working hubs can be an important part of offer for attracting and retaining working-age people.

Compact growth

- The URDF and RRDF should be expanded and better promoted in line with the revised NPF.
- There should be recognition of the need to look to innovative and diversified funding streams, including strategic utilisation of EU funding sources, enhanced engagement with the European Investment Bank, a pipeline of non-exchequer funding of infrastructure, and developing new models (e.g. City Deals) to fund urban transformation, in addition to the URDF and RRDF.

Population projections

The ESRI updated population and housing projections (July 2024) have informed the draft revised NPF. The updated projection is that the population of Ireland will increase to 5.7 million by 2030 and 6.1 million by 2040. However, the most recent CSO data estimates the population in April 2024 to be 5.380 million. This represents an increase of 196,300 on the Census 2022 population estimate. This is equivalent to 83% of the increase in the projected population between the first NPF and the current revision. The CSO data also suggests that in the two years since the Census 21.3% of the expected population growth of 922,000 has already occurred.

There is considerable focus on targets throughout the revised NPF. These projections must not be treated as an absolute and result in a cap on growth. The issue occurs when these projections are apportioned regionally and through city and county development plans, influencing key zoning decisions for housing and the provision of infrastructure and public services. It is important that the revised NPF plans for population growth in line with the high migration scenario of 6.3 million people by 2040, as per the ESRI modelling.

Growing our regions

The revised NPF recommits to achieving balanced regional development. As noted above, major revisions of the forecasts – growth and population assumptions underlying the draft revised NPF is required, with some already exceeding their forecast levels for 2040. Our regional growth targets should address enterprise and employment, alongside population and housing requirements. However, balanced regional development must be infrastructure-led, which will require ambitious investment in the regions through the NDP to address regional imbalances.

One of the most effective means of stimulating regional economies is by investing in infrastructure including housing, education, transport, broadband, health and making urban centres vibrant and attractive places to work and live. Dublin accounts for almost half of all economic output, making us more reliant on our capital city than any other country in the EU. The revised NPF must result in balanced, sustainable, and plan-led growth across all regions, whilst promoting compact urban growth across the five metropolitan areas, towns, and villages across Ireland. Population growth tends to follow employment growth and the preparatory work informing the preparation of the NPF at the outset highlighted that investment in infrastructure is a key

determinant in facilitating employment growth. Specific regional infrastructure priorities called out in the three RSESs should be reflected in the revised NPF.

In setting targets for future growth of regions, the revised NPF growth forecasts must not cap or limit the potential for growth of each region (NPO 3). There is acknowledgement that the Mid-East and Dublin are growing faster than other areas. This poses a challenge to achieving more regionally balanced population growth, split roughly 50:50 between the Eastern and Midland Region, and the rest of the country. Significant flexibility needs to be incorporated into the revised NPF so that this policy does not limit growth and arbitrarily restrict the delivery of new homes (NPO 2). It is essential that the revised NPF demonstrates a clear recommitment to addressing regional imbalances through sufficient infrastructure investment contribution to population and employment growth across all regions.

Securing compact and sustainable growth

Ireland is a low-density country. This has significant implications for policy making. Dispersed development affects the cost of transport infrastructure and service provision, as well as impacting sustainability and our quality of life. There are environmental, economic, and social benefits of denser living, which Ireland has not yet fully harnessed in urban, suburban, or rural areas. Transport infrastructure, the cost of living, sustainability, and the built environment are all affected by how well space is utilised and they play a role in determining the quality of life.

Through the revised NPF there is a welcome focus on urban centres core as the focal point for growth (NPOs 4 to 10). One of the key long-term legacies of the NPF must be to ensure that there is strong commitment to urbanisation policies, ending the pattern of pro-suburbanisation in practice. Why is density important? Cities and towns concentrate productivity, innovation, and creativity. Higher density urban centres are more successful across these areas. Therefore, increased density is crucial to a metropolitan region's economic future. It can enrich character, place, and identity, which boosts attractiveness and overall competitiveness.

The revised NPF must result in balanced, sustainable, and plan-led growth across all regions, whilst promoting compact urban growth across the five metropolitan areas, towns, and villages across Ireland. It should be noted that compact growth targets (NPOs 7 to 9) only refer to homes; they take no account of places of employment as important to support communities.

Compact growth targets must ensure an adequate supply of commercial and residential property is available, or can be provided, in our urban centres.

It is proposed that a new approach or tool is being developed to monitor and track urban development trends across cities and towns. Such a tool would be important in monitoring the performance of urban infill objectives. For example, brownfield development has longer delivery timelines, with specific delivery challenges, as well as cost and viability issues. Questions remain over the monitoring of planning decisions impacting on compact growth. For example, there are cases of large-scale housing developments and tall buildings being refused planning in areas designated for compact growth.

Transport-oriented development (TOD) is being recognised as core to securing compact and sustainable growth in the five metropolitan areas (NPO 10). It should be acknowledged that a TOD strategy is only in place for the Dublin metropolitan area, with others to be developed for the four other cities. However, the use of TOD is to support strategic planning post-2030. Whilst integrated land-use and transport planning is long-established in planning practice, TOD must not be mistaken for broader infrastructure-led development. Compact growth objectives will also require the delivery of new or upgraded critical and underpinning infrastructure such as water and wastewater services.

Translating the NPF to city and county levels

Increasing availability of zoned and serviceable land will be essential to the provision of homes to accommodate the growth projections set out in revised NPF and by extension to city and county levels, aligned with the RSES and MASP processes. The apportionment of the Ireland's future population at regional, local and metropolitan levels was set out in the *Implementation Roadmap for the National Planning Framework* (July 2018). Each RSES sets out the population projections for each region and respective county/local authority contained within. Each set out the 'headroom' that can be built into each area in terms of population and housing needs, including how it differs for urban areas over rural areas. The population targets are to guide the location of housing and population growth across the region.

Ireland needs a comprehensive approach to strategic land reserve zoning. There is a mismatch in the current practice of zoning land, which is ultimately determined by the NPF. City and county development plans should be permitted to include a headroom of 75% of land being zoned for residential development compared to projected demand has not been sufficient for long-term planning.

All local authorities should undertake strategic land assessments as part of the forthcoming review of local development plans. These should set out the deliverable supply of housing land within a local development plan. It would promote sustainable residential development objectives, bringing an additional layer of coherence to strategic planning.

To support plan-led targets, the revised NPF must give appropriate recognition to the subject of viability in the development plan preparation process. NPO 11 should be amended to state that in advance of any zoning decisions being made by local authorities, a viability assessment must first assess whether there are sufficiently financially viable and suitable lands to deliver on the core strategy. This should be coupled with an assessment of current enabling infrastructure and, more importantly, any gaps to the delivery ambitions. This analysis should be mapped and updated on the Myplan.ie Zoning Map Viewer.

Currently, development plans suffer from land having been zoned that is completely unsuitable for its intended purpose, making it challenging to deliver on housing need. If a viability assessment is not undertaken, our cities and towns will be left with a shortfall in the housing and commercial property delivery identified in the core strategies or such property will be heavily dependent on state intervention and supports to deliver.

Zoning decisions within local development plans should inform capital expenditure decisions on supporting infrastructure to unlock development sites. In addition, Government initiatives such as the URDF, Croí Cónaithe, and Project Tosaigh should be actively targeted at advancing the serviceability of zoned land and to address site viability issues, especially for apartment construction. Development plans should be the basis of a local authority's interactions to strategically target national and European investment funds to increase housing supply. This will require strong engagement with property industry stakeholders.

Effective regional development

Strategic development of Ireland's regions

The achievement of balanced regional development is a key component of NPF. Given our buoyant long-term national population projections, this implies a greatly accelerated pace of development of homes, services and employment in cities and towns across all regions. Whilst regional development is multifaceted, plans set out under the revised NPF and the NDP must be implemented to realise the full potential of each region and ensure growth is delivered to every part of the country.

All counties experienced population growth between 2016 and 2022. However, the Eastern and Midland region is experiencing a share of population growth beyond that envisaged in the 2040 target, with population growth and economic activity continuing to be concentrated around the Dublin Metropolitan Area. It should also be acknowledged that since the NPF's publication in 2018, unprecedented, unforeseen events have occurred with ongoing consequences, such as the impact of COVID-19, particularly in relation to changes in commuting patterns and the shift to remote and blended working arrangements. With hybrid working becoming part of normal working patterns in certain sectors, such changes have the potential to open an array of economic opportunities for all regions and offer considerable longer-term potential in creating smart, resilient and sustainable regions.

It is essential that the regional growth ambition set out in the revised NPF is underpinned by the required infrastructure investment to enable effective regional development. Regional growth ambitions set out in the revised NPF will not be achieved without significant investment in infrastructure.

The EU Regional Competitiveness Index (RCI) has been measuring the major factors of competitiveness for all the NUTS-2 level regions across the European Union. In the RCI, the Northern and Western Region ranks 218th out of the 234 Regions of the EU27 on infrastructure and the Southern Region ranks 193rd. This contrasts with the Eastern and Midland Region containing Dublin, which ranks 54th, highlighting the scale of infrastructure deficits in particular regions. It is vital that this imbalance is effectively addressed so that the vision for regional balance can become a reality.

Regions require better infrastructure and increased service provision ranging from housing, transport, digital connectivity, through to public and voluntary healthcare, social services, and investment in education, skills and

innovation. The delivery of critical public infrastructure remains central to creating a sustainable growth model for every region. It is key to improving accessibility, liveability, and quality of life; making regions more attractive and sustainable places to live, work and invest.

Key principles to deliver balanced regional development include:

- > Accelerated delivery of critical and underpinning public infrastructure and investment in every region.
- > Unlock the potential of higher and further education for enterprise and regional growth.
- > Prioritise sustainable and road transport infrastructure vital for regional connectivity, in addition to metropolitan area transport strategies and medium-term TOD targets.
- > Deliver affordable housing as a key determinant for enabling regional growth.
- > Support the sustainable development of metropolitan areas, regional growth centres and towns and promote the development of a strong network of economic corridors.
- > Maximise the potential of ports and airports to meet future demand, to provide high quality international connectivity, and to deliver renewable energy projects.

The revised NPF must demonstrate strong commitment to supporting and enabling the build-out of strategically important regional or intra-region, including cross-border, economic and spatial development initiatives must be supported by the revised NPF. These include the Shannon Estuary region in line with the recommendations in the *Shannon Estuary Economic Taskforce Report* (July 2023), North-West City Region and the Dublin-Belfast Economic Corridor. Such initiatives should be supported in achieving their growth objectives.

Regional population growth

When compared to the baseline population projections of the existing National Planning Framework (NPF), the new draft NPF shows an upward trend in ambition. Overall population by 2040 is now expected to be 8% higher than the previous projections, a total increase of 16% on 2023 levels. The draft framework is underpinned by more ambitious growth projections for the Mid-East and Midlands of the country, up 24% on the previous projections. Whilst the underlying baseline for the Northern and Western region which underpin the draft is 8% less ambitious than the existing targets. Overall, the population of every region would be expected to grow, with the baseline 2024 projections

showing growth ranging from 21% in the Mid-East and Midlands to 11.3% in the Northern and Western region. It does, however, raise concerns about the prioritisation of balanced regional development in the National Planning Framework. Whilst still at draft stage, the new underpinning population forecasts do seem to suggest some rebalancing away from the West of the country and into the commuter counties.

Baseline projections underlying the existing NPF (2018) and draft revised NPF (2024) (000's)				
Region	2023 population	2018 projections	2024 projections	Percentage change in projections
State	5,271	5,635	6,106	8%
Northern and Western	930	1,123	1,035	-8%
Southern	1,741	1,834	1,973	8%
Mid-East and Midlands	1,101	1,038	1,284	24%
Dublin	1,499	1,640	1,815	11%

Meeting the key infrastructural needs to address greater regional population growth requires an adaptive strategy to internalise any fluctuations in population. The updated figures (above) in regional population growth indicate that the allocation of a greater level of resources is required to keep pace with the NDP's vision for the regions.

The acceleration in regional population growth shows that projections are just that and are therefore unsuitable to serve as hard caps on development schedules. For example, the above change of 24% in the projections for the Mid-East & Midlands population from the 2018 projections represents a need for a stark reworking of the earmarked development for the region. Given the recent history of overshoots in population relative to their projections, a mechanism for a more regular review of population growth would be required to avoid future infrastructural bottlenecks. Such jumps in population projects will leave regions under-resourced if population projects are 1) treated as hard caps and 2) updates in population projections are not frequently incorporated into the planning framework.

The rapid rise in the population in recent years already conveys a strong indication that the proposed revised estimates remain too conservative. The rate of population growth from when the review of projections was taken place and now (below) already indicates that we are on course to overshoot these

revised projections by 2040. The below figures show that population of the state has already grown by nearly a third of the 2040 projections since projections were reviewed in 2022. If current trends continue, Dublin will overshoot its 2040 projections within the next decade if current population trends continue, whilst the Northern and Western region could meet its targets in half of that. Given that every region is currently on track to exceed the 2040 projections, consistent and regular reviews that enable the timely raising of caps is necessary.

Population Projections and Initial Growth Patterns				
Region	2040 Revised Projection (2022)	Estimated Growth Percentage	Current Population (Estimate)	Percentage Growth since 2022 projections
State	6,106	15%	5,380	3.80%
Dublin	1,815	21%	1,534	4.50%
Mid-East and Midlands	1,284	17%	1,115	2%
Southern	1,973	13%	1,780	4.00%
Northern and Western	1,035	11%	948	4.40%

Making stronger urban places

Why urban places matter

Ireland's urban areas must offer people good living and working conditions to sustain economic success and remain attractive to local and global mobile talent pools. Each region, sub-region, metropolitan areas must be enabled to attract inward investment, grow indigenous businesses of scale, and encourage start-ups. The revised NPF must reflect the demands this landscape brings at a local level in terms clustered expertise, availability of talent, education and research capabilities and a strong quality of life proposition.

The focus must be on re-intensification of existing business locations. This strategy aims to create the right conditions for enterprise to thrive, to create wealth and improve quality of life for all. Key aspects are orderly growth, placemaking, smart specialisation and clustering. Consideration is given to future-proofing risk management so that growth is sustainable, competitive, inclusive, and resilient. Skills, talent, and innovation are identified as drivers for resilient and sustainable growth.

The draft NPF places significant focus on the fact that quality and attractiveness of our urban places is a critical factor for inward investment and talent attraction. It is also a crucial factor in talent retention. It is not simply enough to be able to attract the talent to a location, but we want to keep talented people employed locally. The draft revised NPF should clearly call out talent retention alongside inward investment and talent attraction objectives.

Ireland's urban structure

Through the NPF there is a welcome focus on urban centres core as the focal point for growth. One of the key long-term legacies of the NPF must be to ensure that there is strong commitment to urbanisation policies, ending the pattern of pro-suburbanisation in practice. Why is density important? Cities concentrate productivity, innovation, and creativity. Higher density cities are more successful across these areas. Therefore, increased density is crucial to a metropolitan region's economic future. It can enrich character, place, and identity, which boosts attractiveness and overall competitiveness.

The role of employment

Our regional growth targets should address enterprise and employment, alongside population and housing requirements. This will also be required in the case of the compact growth targets. Population growth tends to follow employment growth. As mentioned above, we already achieved 105% of the employment forecast for 2040 set out in the NPF. Whilst it is proposed that the employment target is deleted altogether and as such won't be amended, it is important to stress that the focus of the revised NPF should be on increasing employment generally by better enabling each region to address employment requirements, adapt to new ways of working (e.g. remote/hybrid working, co-working hubs etc), addressing regional disparities, and ensuring specific sectoral requirements and future skills requirements can be provided for. The world of work is evolving and will be impacted by the twin digital and green transitions. Developments such as AI and meeting our climate obligations will impact on roles within the workforce.

Planning for Ireland's urban growth

The NDP must ensure that underpinning infrastructure and appropriate capital investment occurs in the five metropolitan city areas, all regional growth centres, and all key towns across the country designated under the NPF process. These have been targeted to deliver the compact, urban growth objective. They are drivers of sustainable economic, social and employment growth across their respective regions. Each urban centre was selected due to its location and scale of population, employment, and services. These centres will require better infrastructure and increased service provision to accommodate a growing population, ranging from transport, broadband and 5G, energy, and water infrastructure through to healthcare, social services, and investment in education. However, to achieve effective regional development, we must also place special focus on towns right across the country. Smaller towns and villages should be assessed and where necessary, strategically targeted for interventions through the NDP.

Cities, towns, and other urban centres must be safe and usable for all inhabitants, especially women, older people, ethnic minorities, and marginalised groups. Safety concerns, both real and perceived, limit access to the urban centres, including to employment, health, education, political and recreational facilities. Much of the focus has been on the resourcing of An Garda Síochána in order to provide a visible presence within our urban centres. Place-making also plays an important role.

Increased footfall within our urban centres resulting from more people living in, working in, or visiting our urban centres will contribute enhanced passive surveillance. Specific consideration must be given to safety and security measures necessary to support the local experience economy, which incorporates the night-time economy in our towns and cities. Enhanced security and safety plans are required for these urban centres, which support the full range of economic, cultural, and social activities between 6pm and 6am. These include risk assessments for all new public areas and spaces. A collaborative approach is needed between each local authority, relevant public bodies, business, and other stakeholders to make each urban area safer and accessible at night-time. These specific strategies should be based on international best practice focusing on non-legislative actions mechanisms to secure good public safety and public order outcomes. There will also be specific place-making recommendations contained in the report by the Taskforce for Dublin City Centre, which could also inform decisions in the other metropolitan areas.

Ireland's towns

Delivering the objective of compact, urban growth will also require a strong focus on regional growth centres and 'key towns' identified in the NPF and three RSEs. 'Key towns' are large towns which are economically active and provide employment for their surrounding areas. They must have high-quality transport links and the capacity to act as regional drivers to complement growth of a metropolitan city area or a regional growth centre. It is important that these towns develop a more sustainable economic base by increasing the ratio of jobs to workers. This can be achieved through broadening the local enterprise base, creating new strategic employment opportunities, growing the local experience economy, green infrastructure provision and enhanced cultural opportunities.

'Key towns' have the capacity and future growth potential to accommodate above average growth, with commensurate employment growth aligned with requisite investment in services, amenities and sustainable transport. They should be reflected in NPO 15, which also recognises the importance of the North-West City Region, the Dublin-Belfast economic corridor and Drogheda-Dundalk-Newry as cross-border economic interconnectors.

Ireland's cities

There is no specific Government-backed approach to dealing with the challenges and opportunities facing our city centres and connected suburban areas. A coordinated strategy working off a similar template to the *Town Centres First* policy should be developed and integrated into each Metropolitan Area Strategic Plan. However, given that each of the city centres are located within a single local authority area, it may be more appropriate for the relevant local authority to lead on a dedicated approach in close cooperation with central government, other public bodies, the business community as well as other regional and metropolitan stakeholders. The goal of the strategy is to coordinate attractive, adaptive, and healthy place-making in our city centres, including looking at changing the mix of uses, public realm improvements, sustainable and active travel investments, as well as alignment with other government policies. It may also be useful to look at specific requirements of large suburban areas and sustainable neighbourhood policies.

Planning for urban employment growth

Cities and towns must be developed in terms of their economic self-sufficiency to minimise the need for commuting and support the development of surrounding areas. This would support locally generated employment and create prospects for growth. Employment creation will come from a broad base of possible activities; it is critical that potential is recognised and supported across a range of possible sources both indigenous and from overseas. We must help firms attract and retain scarce talent; a greater focus on supporting indigenous enterprises; and commitments to underscore Ireland as a beacon of certainty for mobile investment in an increasingly uncertain global economy.

Examining employment on a sectoral basis is vital in understanding the dynamism of the economy and where skills and investment may be leveraged at a regional level. This insight is also helpful when designing enterprise and skills development policies. Improved business conditions will support job creation and boost local employment opportunities.

The revised NPF must support the requirements of traditional and emerging business sectors (e.g., financial services, fintech, biopharma, medical technology, business services, engineering, digital technologies, infrastructure etc) over its lifetime. The Enterprise White Paper has identified seven strategic priorities out to 2030:

1. Integrating decarbonisation and net-zero commitments
2. Placing digital transformation at the heart of enterprise policy
3. Advancing Ireland's FDI and trade value proposition
4. Strengthening the Irish-owned exporting sector
5. Enabling locally trading sectors to thrive
6. Stepping up enterprise innovation
7. Building on strengths and opportunities

These should inform the enterprise components of the revised NPF. Reference is also made in the draft NPF to the nine DETE Regional Enterprise Plans. It should be noted that these plans are not statutory and do not have funding attached to them to drive delivery.

The focus must be on re-intensification of existing business locations. This strategy aims to create the right conditions for enterprise to thrive, to create wealth and improve quality of life for all. Key aspects are orderly growth, placemaking, smart specialisation and clustering. Consideration is given to future-proofing risk management so that growth is sustainable, competitive, inclusive, and resilient. Skills, talent, and innovation are identified as drivers for resilient and sustainable growth.

Transport infrastructure, the cost of living, sustainability, and the built environment are all affected by how well space is utilised and they play a role in determining the quality of life. The NPF champions densification and urban development and there are environmental, economic, and social benefits of denser living that Ireland has not yet fully harnessed in urban, suburban, or rural areas. The combination of these overlapping objectives leads us to transport oriented development (TOD) – but there must be a distinction drawn between aspiring for improved mobility vs liveability. Improving mobility between dormitory commuter towns and areas of higher employment is a clean-cut aspiration – while creating strong towns and cities in the vein of 15-minute cities with employment opportunities, amenities, and necessary services all easily accessible through sustainable transport modes is a more complex challenge for the NPF.

The National Smart Specialisation Strategy for Innovation (2022-2027) provides a framework to coordinate regional and national actors to pursue dynamic, bottom-up innovation. Smart specialisation (S3) is an important mechanism for unlocking the growth potential of Ireland's regions by addressing imbalances and underperformances and supporting the development of existing and emerging industry clusters.

Close alignment between the NPF and the S3 is needed to facilitate each region to build on its identified strengths and to fulfil the high-level goals set out in the strategy. This includes leveraging new funding to address gaps in existing regional innovation infrastructures and systems. Provisions must be made in exchequer funding commitments towards supporting investment in necessary innovation infrastructure across our higher education institutions and increasing allocations more generally in human capital initiatives aimed at boosting our research and innovation goals. Funding should also be made available to better enable the development and expansion of the ‘smart city’ and ‘smart region’ models, development and expansion of industry clusters, and to support the continued development of innovation districts and incubation centres.

Achieving urban infill / brownfield development

The revised NPF must be guided by the Enterprise White Paper. All regional, metropolitan, and local development strategies must support enterprise growth across the country. Ultimately, the output of these plans must be an adequate supply of commercial and industrial property, which are appropriately matched to their location. This must be reflected throughout the national planning hierarchy established under the NPF.

Local zoning decisions must give appropriate recognition to the fact that certain heavy industrial operations or manufacturing sites are not suitable for inner city areas. These must be sited close to and/or on the periphery of urban centres (NPO 20). This is likely to require development on certain greenfield sites, as compact growth policy has targeted existing brownfield sites for the supply of new homes along with commercial activity which are more suitable for high-density, mixed-use locations. Through the revised NPF and the RSEs, each local authority should conduct strategic land assessment for commercial and economic use with particular focus on place- and site-specific requirements of certain industry sectors, infrastructure requirements and level of serviceability, so that an adequate quantum of land can be zoned accordingly.

Metropolitan cities and towns will have to work harder than ever before to entice people into its urban core. Increasing footfall is one priority. Higher density within our towns will also make a beneficial contribution. Achieving a greater mix in uses within urban areas will lead to sustainable rejuvenation occurring. It requires achieving a better and more appropriate balance between residential, retail, and other commercial or business activity. This will require a collaborative approach between local business, the local authority and Government to be successful.

The commercial mix requirements of cities and towns are changing, in addition to providing more housing within our urban centres. Local authorities would benefit from assistance and guidance in initiatives aimed at repurposing existing assets into other sustainable uses. The revised NPF should encourage active land management initiatives to address vacancy and dereliction in our cities, towns, and villages across the country. This would require a specific ‘city centre first’ policy, in addition to Town Centres First, and would require focused investment and prioritisation to effectively tackle it.

Zoning decisions must be pragmatic in supporting the development of cultural and leisure activities, as well as supporting activities such as restaurants, takeaways, night-clubs and increasing late-night premises, including those providing an alcohol-free alternative such as cafés and coffee-shops. A diversity of activities needs to be supported to ensure our cities, towns and villages are attractive, safe, and vibrant. We need greater versatility in permitting the ‘change of use’ of a premises so that it can be used for housing or other commercial activity. The necessary planning and regulatory changes should be considered as underpinning or strategic enablers of urban regeneration

Achieving greater diversity of land use within urban areas will aid sustainable rejuvenation. This requires a better and more appropriate balance between residential, retail, and other commercial or business activity. The revised NPF is an opportunity to encourage the development new long-term strategies for urban spaces based on accessibility to amenities and services. This replaces previous thinking of designing cities from solely the logic of mobility, which has led to unsustainable commuting patterns. It requires a focus on the ‘localisation of the Sustainable Development Goals’, ‘tactical urbanism’ and of course, the ‘15-minute city’.

The 15-minute city concept is not new. It has been a core principle of good placemaking for decades. However, the lived experience of metropolitan inhabitants across the globe during Covid brought a renewed focus on attractive, adaptive, and healthy placemaking. Encouraging higher density within urban cores is important. It on its own will not sufficiently lead to the achievement of the ‘15-minute city’ for our five metropolitan areas. The revised NPF must also place a strong emphasis on creating sustainable neighbourhoods. This requires ensuring that neighbourhoods across the city can access a range of facilities by walking, cycling, or high-quality public transport.

Focusing on neighbourhoods is key. Some parts of a metropolitan areas may be '10-minute' or even '5-minute' cities, whereas other areas have inefficient or poorer access to transport or social infrastructure. We need to understand how each neighbourhood functions within a city that works. The revised NPF can support this through better integration of land use and transport planning, as well as informing decisions on the location of essential services. This approach would enhance the liveability of our cities as well as boosting their attractiveness as a place to do business.

Delivery issues associated with brownfield development must be addressed. As is put forward throughout this submission, brownfield development is slower and more expensive to achieve. Designated sites will require master planning, and the legislation for the Urban Development Zones (UDZs) is not in place. Brownfield can be complicated due to issues with land assembly, such as costs of re-locating viable businesses and to ensure suitable alternative locations are planned for and are available. Brownfield development will require substantial infrastructure investment, as well as potential high costs across a range of categories including potential CPOs, undergrounding of pylons, land reinstatement/remediation costs (e.g. Seveso sites) etc. These challenges cannot be achieved by the URDF and Land Development Agency (LDA) alone. They will require the buy-in of the private sector, as well.

The role of the LDA has evolved from a land activation body to also one of housing delivery. NPO 21 states it is to deliver a significant number of homes on State lands, with a specific focus on brownfield development. It should recognise that designated areas listed the draft revised NPF and in the RSEs for such development are not by-and-large State-owned lands (e.g. the City Edge). Specific focus on, and funding for, site assembly will be required.

Issues with the RZLT in terms of a lever to achieve compact growth objectives are flagged elsewhere, as well as acknowledging that there is no legal basis for Land Value Sharing Measures. Innovative funding streams need to be sourced as well as leveraging the development company model to deliver large-scale urban transformation projects.

Performance-based design standards

A sensible approach to urban building height limits will make a significant contribution to delivering the core objective of compact, urban growth (NPO 22). A focus on height will allow us to address the problems of urban sprawl, housing and commercial space shortages and improved densification. The approach taken by local authorities has been inconsistent and incoherent. Blanket restrictions on height in local development plans have resulted in

sites within areas in need of redevelopment and regeneration, being underutilised, sterilised, or inadvertently making a proposed development financially unviable.

It is both important and appropriate that revised NPF champions increased height in urban in developments. This would be in line with the Urban Development and Building Heights Guidelines for Planning Authorities (2018). The ‘comply or explain’ principle should apply, where developments lower in height must be justifiable. Development plans must also include a clear statement on taller buildings in relation to sustainable development, within appropriate locations within the metropolitan area. In developing policy on building height, attention should be paid to international best practice in urban design and regeneration. There should also be acknowledgement that clusters of well-designed taller buildings can provide housing and make a beneficial contribution to their surrounding streetscape and skyline.

Planning for diverse rural places

The role of the Town Centre First policy

Town Centre First – A Policy Approach for Irish Towns is a coordinated and comprehensive policy response to revitalise and regenerate all town centres. It is consistent with the NPF and the NDP, with the aim to create town centres that function as viable, vibrant, and attractive locations for people to live, work and visit, while also functioning as the service, social, cultural, and recreational hub for the local community. It is important that the strategy remains flexible to respond at scale to the specific needs of the Regional Growth Centres and the ‘key towns’ identified as part of the NPF process.

People, Homes and Communities

People with disabilities

The National Disability Inclusion Strategy addresses accessible transport, buildings, and streets as key factors in enabling people with disabilities to participate in work, as well as cultural and social activities. This strategy has largely not been adopted or implemented by key government and public bodies. The NPF should incorporate recommendations and findings produced by the various disability organisations regarding accessible placemaking such as the Irish Wheelchair Association's *Getting Nowhere, Reviewing the Government's Approach to Accessible Public Transport* (February 2024).

Towns and cities must be accessible to all inhabitants, and this should underpin urban design and should include the roll-out and maintenance of pedestrian and cycling infrastructure. For example, 'first-mile' and 'last mile' considerations influence a commuter's choice to use public transport or not. We must also recognise that pedestrians are at the top of the hierarchy of road users in Ireland. A 'pedestrian first', incorporating the Universal Design approach to ensure infrastructure is accessible, is the starting point for moving towards a truly sustainable travel model for our region. This includes the delivery of walk-wheel-cycle networks and providing an enhanced quality of life for all. It is important for everyone to have a safe journey, no matter where they are going, but this is especially important for people with disabilities, as they may be unable to get out of dangerous situations or be more vulnerable in certain instances.

The revised NPF should also recognise housing needs for disabled people. The primary objective of the National Strategy for Disabled People 2022-207 is to facilitate disabled people to live independently with the appropriate choices and control over where, how and with whom they live, promoting their inclusion in the community. However, the pace of implementation has been slow, and funding will be required. The revised NPF must ensure that the housing needs of people with a disability are factored into the Housing Need and Demand Assessment process (NPO 47). Universal design will be important. Government and local authorities must also work together to address specific regulatory barriers in the delivery of homes for disabled people. For example, to deliver wheel-chair liveable homes, the building regulations will have to change from 'wheel-chair visitable' to 'wheel-chair liveable'.

Age friendly communities

Ireland's population is ageing rapidly with the share of the population aged 65 and over projected to increase from one in eight to one in six by 2030, and the number aged 85 and over projected to almost double. This will have implications for long-term care services and will also require new models of living and support within communities. UCD research found that most people would prefer to remain living at home for as long as possible and receive care when it is needed in their home. Care in the home can also lead to more positive health and social outcomes. This should be reflected in NPO41.

Encouraging people to trade down requires availability of suitable housing within our urban areas, particularly within their local community. This could be in the form of new built apartments, smaller existing properties, or adapted housing developments for older people. These are in addition to sheltered or supported housing options.

Early learning and childcare

Conducting an audit of creches and after school childcare facilities in local authority areas to investigate gaps and capacity constraints is necessary. Women overwhelmingly request changes to working patterns to facilitate caring responsibilities, and for worktime flexibility and working from home. As such, the revised NPF must support and enable progress on gender equality to be made. Caregivers, both male and female, must have sufficient access to childcare to ensure equitable participation in the workplace and the visibility gains that come with this. Local authorities should be mandated through the revised NPF and associated planning guidelines to conduct childcare needs demand assessments.

Education

The revised NPF must underpin the role of further and higher education for enterprise and regional growth. It must seek to further strengthen the capacity of those institutions to deliver the talent necessary to drive economic and social development across the regions, while also delivering on nationally and international priorities. This should be reflected throughout the NPF and in chapters 3, 4 and 6 specifically.

As the economy, society and the world of work continue to evolve at a rapid pace, enterprise demand for the availability of talent, skills and people will remain a constant priority for Irish business. Continued investment in universities, higher and further education and training in each region will have a crucial role to play in achieving the pipeline of skills and talent that sustains

enterprise clustering and new investments. With global megatrends related to communications, climate change, digitalization and new consumer behaviours and priorities set to continue, the global competition for talent, skills, and people will further intensify.

Research-intensive universities are critical to fuelling economic growth across the country and within the regions by developing the skill base, partnering with industry in leading-edge research and innovation; and supporting the delivery of key public services across health, education, infrastructure etc. It is important that the NPF also recognises their role in collaborating with industry and the development of technology clusters and expertise.

The new Technological Universities will underpin the future economic and social progress of our regions. Dynamic Technological Universities in the regions will build the talent pipeline and significantly increase sustained investment in innovation and R&D. They will unleash the potential of regions to act as an anchor for innovation and high-tech skills development and will enable regions to develop, attract and retain talent, sustainable enterprises and high-quality jobs. To realise the potential of the new institutions and to add further capacity across all regions, considerable investment will be required.

There is no reference to Impact 2030: Ireland's Research and Innovation Strategy, which seeks to make Ireland an 'Innovation Leader' by 2030 in this section, whilst it is referenced in NSO 6. A vibrant research and innovation ecosystem is an important lever for driving Ireland's international competitiveness and has supported Ireland's leadership in key innovation areas such as immunology, pharmacology, agriscience and material science. However, an underinvestment in Ireland's research and innovation system is limiting the country's innovation potential and our comparative performance internationally. This will require a firm commitment by Government to deliver a long-term investment programme to deliver world-class innovation infrastructure. There is an urgent need for a long-term financial commitment to the upgrade, maintenance, and development of national research infrastructure.

Without a significant shift in Ireland's strategy towards innovation infrastructure investment, Ireland's economic potential, balanced regional development as well as our ability to attract and retain FDI, and our ability to compete internationally are undermined and are at risk of degradation. This undermines the national strategic objective set out in the NPF to secure a strong economy through enterprise, innovation and skills (NSO 6). This objective will not be fully achieved without taking stock of Ireland's research

and innovation assets and investing in their long-term upgrading and maintenance, in addition to the stated action to expand and consolidate further and higher education facilities.

Higher education institutions and the student population make a significant contribution to the vibrancy and diversity of our cities and town. They are a foundation of the innovative and creative economy that our urban centres require. Innovative companies, both home-grown and multinational require access to highly educated workers. Ireland's talent pool remains our key global competitive advantage, and a vibrant student population is an important aspect of both the economic and social life of cities and towns across the country. This ecosystem is interlinked with future regional economic development, and the revised NPF must reflect this.

Education is core to regional revitalisation and growth of our regions. Our cities and town must be recognised as a student friendly. International students make a valuable contribution to the economy and are a source of inward investment, bringing diverse multicultural benefits. We must ensure that our regions continue to attract a vibrant and diverse student population. Higher education institutions must be adequately supported through the spatial planning system so they can continue to attract students as well as research and business investment.

Housing

Ireland's ability to respond to current and future capacity pressures in housing and other areas is the single biggest threat to our competitiveness and economic wellbeing. Our growing population will see a steady increase in the number of new households being formed. Each of these households will need a home. This will involve a combination of owner-occupied, as well as renting households. It is important that the county's housing policy adequately accounts for the expected demographic changes that will impact the housing stock and mix required over the coming years. The demand for homes is also driven by changes in the average household size. A holistic view of housing is required, allowing for an appropriate mix of location, type, tenure, and accommodation.

The ESRI updated population and housing projections, which were published in July 2024 are to shape the revised housing targets in the NPF. Of the scenarios considered by the ESRI modelling, the average need for new homes between 2023-2030 would be 44,000 annually. Alternatively, in the highest demand scenario of continued high migration numbers and a fall in household size, there would be a requirement for 53,000 homes annually. It is important

to note that these figures do not consider the pent-up demand in the housing market that has accrued in recent years. The Housing Commission has estimated that, as of the 2022 Census, there was an existing deficit of between 212,500 and 256,000 homes relative to our existing population. A recent analysis by Hines, comparing home completions to population growth since 2004, suggested that the shortfall in Dublin alone was around 25% of the existing stock. This was the highest such shortfall amongst European cities.

It should also be noted that the revised NPF will not result in a significant increase in housing construction in the short-term. It has proven too rigid in its approach to housing, prioritising regional/local apportionment of targets over delivery of housing upfront. Increased housing targets appear to be backloaded. Population and housing targets (national, regional, metropolitan and local) must be the baseline, not a ceiling for growth and ambition.

Incorporating pent up demand into housing targets is both necessary and just. Such demand is likely to push up targets for 2023-2030 significantly. Furthermore, there is a possibility that increasing homebuilding could induce a fall in the average household size, as more young people choose to live outside their family home. This would further add to demand. Whilst differing population assumptions will have a substantial impact on targets over the medium-term, it would be reasonable to plan for delivery capacity of around 60,000 homes annually over the next two decades, and NPOs 43 & 46 be amended accordingly.

Building resilience in housing

Compact growth is a core NPF objective (NSO 1). Urban centres will require a significant increase in density. A new pragmatic approach must be taken by the relevant local authorities, supported by all appropriate national guidance (e.g. Sustainable Residential Development and Compact Settlements Guidelines, January 2024) to ensure well-designed higher density development can be delivered in specific locations. However, given the pressing and growing demand for housing, restrictions on housing development at the edge of urban centres should be permissible in the short-term (i.e. to 2030). Constraining development in certain areas on the boundaries of settlements in the short-term could exacerbate the housing crisis, due to the complexities in terms of costs, delivery timelines and infrastructure investment and delivery required to fully meet the objective of compact, smart growth through urban infill. It is a questioning of sequencing sustainable development. This ultimately should be the goal of the NPF to 2040.

Housing demand

The revised NPF must account for the required change in household mix and tenure. We need the right mix of housing in the right areas, in accordance with suitable and sustainable development practices. It is important that the county's housing policy adequately accounts for the expected demographic changes that will impact the housing stock and mix required over the coming years. It would be reasonable to plan for delivery capacity of around 60,000 homes annually over the next two decades.

Social and affordable housing

The State must be more ambitious in its approach to social, affordable and cost-rental housing. Given increases in population and ongoing deficits, it is clear increased housing provision by the local authority sector and Approved Housing Bodies would provide immediate economic and social benefit across the country. Ibec's view is that closer to 20,000 social, affordable and cost rental units annually will be needed, through ramping up delivery of affordable and cost-rental units.

While improvements to the commissioning process for social housing are welcome, the timeframe for project approval remains far too long. It also does not include the actual construction and ultimate delivery of homes. Recent efforts to streamline and expedite the process must be redoubled, specifically addressing public procurement and finance. Local authorities are limited in their debt raising abilities, which restricts the sources of funding available to them for housing delivery. Focusing on social and affordable housing would increase the funding the State could borrow from the European Investment Bank (EIB) and other sources. Funding is available to support the rollout of affordable purchase and cost-rental housing schemes.

Over the next decade, maintenance and refurbishment of the existing social housing stock will come to the fore. The social housing stock is ageing in key urban areas. By 2030, for example, a considerable share of social housing units in the cities of Dublin and Cork will be between 80 and 100 years old. Maintenance, refurbishment, and potential replacement will become an increasing focus alongside of expanding the social housing stock. The age, condition, and availability of alternative units impact the reletting time of social housing. Finally, we must ensure existing public sector capacity constraints (e.g., architects, planners, engineers, public procurement, etc) do not hold back our ambition to deliver the social housing required.

Homelessness

The housing crisis has increasingly become a concern in relation to social cohesion. In society at large, the knock-on effects of the housing crisis can be seen most immediately in homelessness and challenges around adequate accommodation for vulnerable households. The role of local authorities in providing emergency accommodation and homeless prevention services should be acknowledged in this section. Funding allocations to local authorities to provide these important services should be increased along with increased funding to all bodies to ensure implementation of the strategies to resolving homelessness.

Changing family size

Ireland will see a steady increase in the number of new households being formed, reflecting the growth in population coupled with a decline in average household size. This effects the demand for homes, which will involve a combination of owner-occupied and renting households. The existing average household size has been kept artificially high, forcing persons to remain cohabiting longer. Clarity is required for the including in the NPF explicit reference to the current average household size of 2.74 people. This is not in line with the average household size calculation used by the ESRI in its modelling out to 2040.

Students

Students need access to affordable, quality, and safe accommodation throughout their college life. Housing for All and the National Student Accommodation Strategy explicitly call out the need for on-campus and/or close to campus specialist accommodation for students. Not everyone can commute to college from home. Instead, students are left to compete for an ever-shrinking supply of student residence places, or for the sparse availability in the private rental sector, often far from campus. Housing four students in purpose-built accommodation would free up one additional housing unit, alleviating some of the burden in the over-crowded and expensive rental market.

Specialist student housing will crucially play a part in addressing the country's chronic housing shortage in key urban areas so they can be attractive areas to live, work and study in. Calling out the role of student accommodation in urban planning policies recognises the role the student population plays in making a significant contribution to the vibrancy and diversity of cities and towns across the country.

Housing need demand assessment

The revised NPF must ensure that the Housing Need Demand Assessment (HNDA) tool properly factors in changing household size into its considerations. Solely, relying on the census data does not reflect the underlying issues and the divergence from the European norm. The HDNA should better accommodate this reality and bring us close in line to the European average and Ireland's long-run trend of declining household size prior to 2016.

It is surprising that the only reference to the private rental sector in the entire NPF is in the context of the HNDA. The dysfunctionality of Ireland's housing market can be seen in the rental sector. Alongside further growth in 'cost-rental' schemes, specific attention must also be urgently given to the private rental sector. For example, companies are increasingly reporting challenges of their employees in not just finding affordable rental accommodation, but in finding any suitable accommodation. If Ireland is to be a location which both attracts and retains skilled people into the future (e.g. NPO 14) a sustainable, affordable, secure, and high-quality rental market will be key.

It remains important that the benefit of providing housing in this tenure form is recognised. The rental market in future will need to provide greater certainty, greater quality and cater for households for a longer period and until later in the typical household cycle. This requires policy change in other areas. For example, the interaction between pensions and the affordability of accommodation post-retirement.

The experience of the last cycle of development plan preparation points to a degree of hostility to the provision of new rental accommodation (e.g. Build-To-Rent development). The role of the private rental sector in housing must be recognised. The NPF must continue to prioritise the development of apartments urban centres where the greatest level of demand comes from renters. This will have a direct knock-on effect to addressing the wider housing crisis.

We are still awaiting the publication of the private rental sector review, which was initiated by Government in 2023. Policy stability and regulatory certainty is urgently required, and any strategic decisions must address planning issues, tenant rights and incentives for property owners. Government must set out a clear target for the delivery of rental properties as part of the overall national housing targets; and progress must be monitored on an annual basis. Finally, we must ensure that all local authority development plans are consistent with government housing policy on the rental sector.

Realising our island and marine potential

Ports

Our ports serve as economic catalysts for coastal regions across the country. They are strategic assets for our international competitiveness and will play an important role in the green transition and building a resilient economy. There is strong and steady growth of trade inflows and outflows from Ireland's ports. Delivery of new port infrastructure will enable greater capacity, climate resilience and diversification of revenue streams – such as ports key role in the facilitation of Offshore Renewable Energy (ORE).

Maritime planning

Ireland's National Marine Planning Framework (NMPF) was published in 2021. The NMPF aims to balance the different demands for using the sea including the need to protect the marine environment and ensuring that these activities are as efficient and sustainable as possible. The immediate objective for the revised NPF is to recognise the changes that have taken place in terms of maritime spatial planning since 2018 and to clarify how integration between the two statutory spatial plans is to be achieved. Also, clarification would be needed on how the Maritime Area Regulatory Authority (MARA) and Office of the Planning Regulator (OPR) will interact on matters relating to the performance of development and activity that cut across both spatial plans. In addition to this, the relationship between foreshore planning and land use planning remains uncertain.

Substantial capital projects are either planned or are already in progress at our three Tier 1 ports (Dublin, Cork and Shannon-Foynes) as well the growing scope for smaller ports such as Rosslare, Galway and Dun Laoghaire. Due to the nature of port developments, the planning process tends to be more complex - involving multiple consents from different agencies and Departments alongside EU environmental legislation. At present, there is significant duplication of the licensing and consent procedure for new coastal infrastructure. This has the potential to hinder investment in the region's ports, in marine tourism, and aquaculture. This can result in the process being both slower and costlier than would be the case for inland infrastructure of comparable scale. Addressing timelines surrounding onerous foreshore licences will require tackling the growing backlog of foreshore license applications under existing legislation stemming from the 1930s, which is frustrating the progress offshore wind projects.

Capacity

Our ports have undergone changes in operating models in recent years – from responding to unplanned increases in demand and customs provisions in the wake of Brexit, to facilitating our concerted push towards ORE, it is imperative that they be allowed to expand in a manner that does not lead to capacity constraints given their outsized influence on the flows of trade to and from our trade-intensive island. Lengthy timelines for delivery of port infrastructure cannot be allowed to weaken the ambition of Irish ports. It is under the assumption that all currently on-track expansionary projects are successfully delivered that the Ports Capacity Study claims to see Irish ports handle forecasted demand out to 2040. This is while also referencing the fact that financing and planning difficulties may cause delays and associated capacity constraints.

Regulation and funding

The 2013 National Ports Policy (NPP) – which is due to be revised in 2025 – may offer slightly outdated guidance given its age. Engagement of the NPF with the revised NPP will be essential. The regulatory landscape for port infrastructure projects has also undergone a transformation since 2013, with the introduction of the Maritime Area Planning Act, the establishment of the Maritime Area Regulatory Authority and swathes of new legislation reforming the planning system more broadly. New funding streams have emerged over this time, with new opportunities for developing portside facilities to bolster infrastructural resilience without falling foul of EU State Aid rules arising. Projects such as dredging, constructing breakwaters etc. have been re-categorised as public goods and should be availed of as such.

Offshore renewable energy (ORE) and alternative fuel infrastructure (AFI)

Given the laudable performance of the State's ports in the wake of both Brexit and Covid-19 trade disruptions, informed long-term planning and sufficient support from Government can ensure the continued efficient operation of our ports alongside new opportunities from ORE. To deliver the clean energy Ireland needs, concerns around onerous planning considerations such as Foreshore Licences and the scale of capital investment required - which warrants financing through long-term debt - must be addressed. The level of project and market risk involved in ORE would prove well beyond the means of all but our largest ports in the absence of financial support or loan guarantees from the State. Given the scale of ORE ambition ports are facilitating, they will not have the financial capacity for ORE at scale without significant

government investment. Complementary investments in electric grid capacity will also be required.

The development of alternative fuel bunkering facilities at ports, an aspect mandated under TEN-T, has the potential to support greener road haulage fleets and decarbonise heavy-duty vehicles at ports. There is considerable concern around the pace of alternative fuel facilities provision in advance of 2030, which could lead non-compliance with both Refuel EU and AFIR requirements. The current infrastructure gap is a clear barrier to deployment as ports lack sufficient shore side electricity supply for vessels. AFI will require sufficient of lands in port areas, particularly during the transition phase where multiple fuel options may be explored and when demand and utilisation may be difficult to predict. Land requirements for AFI will need to be considered both as part of the net-zero pathway plans and in conjunction with the overall masterplans of Irish ports.

Designated maritime area plans

The *Shannon Estuary Taskforce Final Report (2023)* has set out recommendations for the delivery of up to 30GW of Atlantic Offshore Wind through the Estuary by 2050. Key to the facilitation of this will be a Designated Maritime Area Plan (DMAP) for the West of Ireland – which currently only exists for the South of Ireland. Alongside this, the establishment of a National Floating Offshore Wind Development Agency can serve to steer the delivery of this ORE potential and the upscaling of the Atlantic’s offshore grid.

Location and access

Ports are guided by considered individualised, long-term master plans which allow adequate scope for corresponding investments in their environs. However, public awareness on the necessity of expanding port infrastructure will be required going forward – especially in a context of land scarcity in urban areas and resistance to new infrastructure along coastlines on environmental grounds.

Given the proximity of our Tier 1 & 2 Ports to large population centres, accessibility to them for logistic and transitory purposes should be improved. However, they often operate in confined urban areas with a finite amount of space for development. Their role in supporting a number of our national objectives should be given weight when alternate use of potential port lands is considered.

Working with our neighbours

Ireland and Northern Ireland

Cross-border economic and spatial development must be supported by the revised NPF, with investment being provided through an aligned NDP. This collaboration is imperative to adapting to the economic and social challenges posed by the new Brexit-induced North/South dynamic, allowing us to better meet climate targets, address energy security and to respond to emerging challenges. The NPF contains detailed all-island spatial planning objectives, including commitments made to strengthening all-island economic interaction especially in the border region, the North-West Strategic Growth Partnership, and the Dublin-Belfast Economic Corridor.

The renewed focus on the all-island dimension in the draft NPF is welcome. The lack of attention to all-island dimension in the NPF Issues Paper was disappointing. It is important that the revised NPF sustains support for the objective of achieving greater spatial coherence and planning on an all-island basis.

Dublin-Belfast Economic Corridor and the North-West Strategic Growth Partnership

Strategically important cross-border economic and spatial development initiatives must be supported by the revised NPF. These include the North-West Strategic Growth Partnership, which is also recognised as the North-West City Region and the Dublin-Belfast Economic Corridor. The revision of the NPF should examine ways of making these two initiatives more effective so that they can achieve their growth objectives. For example, Letterkenny's Regional Growth Centre strategy is framed in the context of it evolving into the North-West City Region with deep connectivity across the border to Derry, which has the potential of building a metropolitan region of critical mass, with a population target of approximately 200,000 people. It has the "capacity to provide the only potential paired city growth pole on the Island of scale - reaching a European benchmark 5 million population target to compete with similar city regions in the EU" (EMRA RSES). The corridor is a cluster of high growth and strong performing centres and cities such as the Drogheda-Dundalk-Newry economic zone, which acts as a North/South economic interconnector.

The revision of the NPF should examine the implementation structures and roadmaps for the North-West City Region and the Dublin-Belfast Economic Corridor. This could be done along the lines of the review of the MASP implementation bodies, as successful delivery will require the active involvement of different stakeholders. The revised NPF should clarify the roles of all key national, regional, and local authorities in supporting the delivery of these two important inter-regional and North/South shared island initiatives. Funding must be provided to support the development of the Dublin-Belfast Economic Corridor, and the North-West City Region through the NDP. This includes support for key enabling infrastructure, such as enhanced rail links through the All-Island Strategic Rail Review (e.g. hourly-frequency Dublin-Belfast rail service) and road access (e.g. A5, N2 and road upgrades in Monaghan and Donegal).

Co-ordination of investment

The island of Ireland, north and south, are both facing the challenges that have exacerbated since the NPF was published such as climate transition, demographic change, digitalisation, and specific issues with achieving regional development targets. Conditions have significantly changed for the movement of goods and people on the island of Ireland, and certainly in the border region, and on primary N/S transport arteries. Local and regional economies function across both jurisdictions, creating an all-island market spanning many sectors. Our ambition is for a fully connected all-island market that post-Brexit continues to support and sustain greater prosperity and employment through increased flows of people, goods, services, energy, and investment. These should be addressed in the revised NPF.

To maintain, strengthen and sustain conditions for North/South cooperation, the revised NPF must support all-island initiatives in critical areas such as climate change and the decarbonisation agenda, energy, education and skills, R&D, healthcare, connectivity, joint spatial planning, and infrastructure provision. There is also a need to address obstacles to cross-border working to take full advantage of the All-Island Labour Market.

Cities and local economies in Northern Ireland have a strong influence on the economies on this side of the border. Towns within the region derive economic benefits by their proximity to urban centres in Northern Ireland. The substantial economic benefits to be gained from developing a shared island include considerably expanding the scope and possibility for shared public service provision. It allows for a deeper pool of labour, knowledge spillovers, and supply chain integration between centres of economic activity. It also significantly improves the lives of citizens and communities when and where

joint and/or coordinated public service provision eliminates the geographic impediments of the border.

Significant investment in essential infrastructure across both jurisdictions will be required to sustain economic gains. Failure to do so will result in chronic infrastructure deficits negatively impacting both competitiveness and quality of life. Key transport projects would improve N/S linkages and at the same time would also facilitate improved accessibility in the North West region. Consideration will have to be given to increasing sustainable mobility transport options that will arise from the All-Island Strategic Rail Review published in July 2024, which requires new investment to be earmarked. Pivotal projects such as the North-South Interconnector, which will help ensure key climate actions for carbon reduction, must be delivered. The revised NPF must allow for the identification of new and more ambitious post-Brexit projects to underpin further development of the shared island so they can be rapidly advanced. Previous commitments given under the NDP process should be revisited and reviewed. Progress on delivery and implementation should be assessed, reprioritised if necessary, and updated accordingly in the NDP.

Key road and rail priorities include:

- > Engage in regular N-S collaboration on spatial strategies and long-term development plans, such as for the National Development Plan and its regional implementation.
- > Prioritise the delivery of all-island infrastructure projects that will deliver most economic benefit such as the A5 North-West transport corridor, the North/South Electricity Interconnector and the train service along the N-S economic corridor.
- > Ensure decisions taken today regarding the island's road and rail network are consistent with population projections and comparable in nature to competitive global regions.
- > Complete an all-island core road network – including for electric vehicle charging – while supporting de-carbonisation targets.
- > Prioritise the Belfast/Dublin Enterprise service and ensure it has long-term flexibility to respond to market growth and commuter needs (i.e frequency, capacity and speed). Examine the economic gains from having a high-speed hourly service.
- > Collaborate on the delivery of a rapid EV charging point network across the island.

Coordination will be needed on delivery in addition to engagement on infrastructure investment. A Joint North-South Committee needs to be established to monitor and prioritise all-island infrastructure projects. We must highlight synergies for private sector investment in the all-island economy and exploit all sources of funding. This would include:

- > Explore the possibility of securing funding from the EU and other sources for all-island investment, particularly in a sustainability context.
- > Explore support from the US Government/US Investors which will provide additional investment across the island to support and sustain peace and prosperity underpinned by the Belfast/Good Friday Agreement.
- > Consider the development of a new joint Strategic Investment Fund to mobilise critical infrastructure, network upgrades etc., that is additional to existing commitments such as from Shared Island Funding or the EU/UK PEACEPLUS Programme.

Finally, the NPF must prioritise measures which would support the long-term resilience of the all-island economy. Strategic planning will play an important role in helping to protect the all-island economy in areas where lack of coordination or disruption could leave the island vulnerable to economic shocks. These areas include demography, food production, AI, and climate change.

Managing our shared environment responsibly

Many aspects of the all-island economy have performed strongly despite the challenges of Brexit but there are several areas which would benefit from further cooperation. There is an urgent need to progress North/South policy coordination to protect the Single Electricity Market, secure the island's energy supply and meet legally mandated net-zero climate action goals.

- > Regional collaboration should be supported through embracing new opportunities for North-South and East-West collaboration and policy alignment on energy and climate action.
- > An Energy Futures 2040 scoping exercise should be undertaken to plan the future energy landscape.
- > Enhance regulatory and policy cooperation and certainty to mobilise investment.
- > Accelerate the net-zero transition through new research collaborations and knowledge transfers.

- > Ensure adequate investment in electricity infrastructure, including re-enforcing the all-island grid for greater capacity.
- > Protect and strengthen the all-island Single Electricity Market, which has been integral to reinforcing energy security and integrating renewables.
- > Strengthen gas security and decarbonisation efforts.
- > Widen the scope of the all-island Single Electricity Market to help tackle the immediate challenges and, looking to the future, deliver a secure and self-sufficient electricity market on the island of Ireland.
- > Invest in generation and network infrastructure to support renewables and address capacity deficits.
- > Align policy across the island for offshore energy.
- > Enhance energy crisis cooperation and planning between Great Britain, Ireland and Northern Ireland.
- > Urgently address delays in strategic energy and renewables infrastructure development due to planning and regulatory challenges.
- > Provide clear policy signals and guidance for investors and businesses to support the net-zero transition.
- > Align with net-zero/Green Deal standards across the island to adapt products and services.

Cooperation and collaboration on river basin management plans, strategies to improve water quality in rivers and areas relating to the Water Framework Directive remain important regardless of the withdrawal of the UK from the EU. Cooperation needs to extend to address and share expertise on issues relating to water and wastewater. There is the need to set up an all-island multi-stakeholder taskforce to mobilise financing and strategic investment in all-island water infrastructure to leverage economies of scale and shared catchments to address shared issues and challenges of supply quality and resilience.

Climate transition and our environment

Given the commitments included in the Climate Action Plan and other policies, the revised NPF must facilitate decisive action in tackling carbon emissions across the economy in a way which does not jeopardise our continued economic success. The revised NPF must be climate-proofed and aids in swiftly delivering the critical energy infrastructure needed to transform our economy. The infrastructure needed to diversify our energy supply will need prioritisation in the revised NPF, from offshore wind to current gas network upgraders. The NPF's focus should remain fixed on compact development, sustainable mobility and material circularity. While varying interests vie for use of available land, the NPF must enforce sustainable land-use management to enable large-scale carbon sequestration through afforestation.

Climate action and planning

Desired levels of environmental conservation and restoration of nature can only occur in tandem with delivering compact urban growth. Successful colocation and clustering of amenities and critical utilities not only improves accessibility but will also result in decreased transport emissions.

Acknowledging the relationship between land use planning and transport infrastructure can alter our unsustainable development patterns and prevent carbon emissions being baked in through commuting patterns. Promoting building re-use is a valuable tool, yet onerous fire safety regulations have tied the hands of those aiming to develop over-the-shop living in our urban cores. Allowing for a clearer regulatory path to building re-use has the potential to unlock swathes of housing in existing urban areas.

Sustainable land management

We must ensure that there is adequate supply of zoned land for industrial use in our local and metropolitan areas to facilitate urban infill and brownfield development. Sufficient enterprise zoning for further business expansion on town peripheries cannot be jeopardised in the push for greater housing supply.

Vexatious litigation continues to delay housing and infrastructure delivery. Concerns should be fairly weighed in the context of the ongoing housing crisis and infrastructural deficit we are currently facing. Given Ireland having one of the EU's lowest shares of population living in apartments, a shift in the public narrative around high-density development is warranted and a more balanced approach to what constitutes infringement on the built environment. A

sensible approach to urban building height limits will make a significant contribution to delivering the core objective of compact, urban growth. A focus on height will allow us to address the problems of urban sprawl, housing and commercial space shortages and improved densification.

Critical utility providers and other actors involved in infrastructure delivery have been actively collaborating and working in lockstep with one another in the absence of an established means of doing so. We must champion this greater joined-up thinking regarding coordinated infrastructure interventions – as seen with cooperation between Uisce Éireann and EirGrid on the Royal Canal. First-mover developers on newly residentially zoned land should also not be punished for doing so through incurring costs for establishing critical utility connections. This disincentive can be addressed in cooperation with critical utility providers and local authorities.

Land use review

To achieve our 2030 targets and 2050 ambition, Ireland will need large-scale carbon sequestration, through afforestation and sustainable land-use management. There is currently no agreed sectoral ceiling for the land-use sector (LULUCF). Ireland will need to deliver the removal of 29.7 MtCO₂eq by the end of the decade. Achieving this will require at least 8,000 hectares of new afforestation each year, with a diverse mix of conifers and broadleaves. This would put Ireland on a pathway to delivering a national forest estate of 1 million hectares by 2050. The decision on a LUUCF ceiling and the forthcoming national land-use review will likely demand additional sequestration and biodiversity protections.

Circular economy, aggregates and minerals

The revised NPF must support the implementation of the 2020 Waste Action Plan and the transition to a resource smart circular economy. This demands the widespread adoption of circular design and innovation principles and life cycle environmental impact assessments. The revised NPF must prioritise where possible the development of brownfield sites, regeneration projects, and the re-use of materials.

The renewed focus on the built environment and construction waste is warranted given that C&D is the fastest growing waste stream nationally and is currently making up over half of our total waste tonnage. To see a greater share of C&D waste recycled, the stated improved materials management in the Revised NPF should feature recycled aggregates as a central component - in line with National Policy Outcome 77. With recycled aggregates in the United Kingdom reaching 25%, the Irish uptake is almost zero. While the recently

published EPA End of Waste Criteria is appreciated, legislated minimum usage will reduce embodied carbon across the sector, grow consumer confidence and boost competition amongst suppliers. First-movers in this space have been victim to weak market demand and inordinately lengthy planning applications.

Despite reference to the Critical Raw Materials Act (CRMA), the newly developed role of extractive industries as a means of securing strategic autonomy for the European Union goes unaddressed. These strategic projects will see Ireland's required output of critical and strategic raw materials drastically increase. Permitting timelines and other planning-related restrictions have the potential to see us underdeliver on EU-mandated levels of extraction and not adhere to binding timelines. The recommended streamlining through a 'One-Stop-Shop' will face stiff headwinds in Ireland. Given the current focus on reforming our out-dated national processes, initiatives stemming from the European Green Deal, FitFor55 & Repower EU legislation have overall not been given due consideration.

Built environment

Irish buildings are an outlier in Europe for their inefficiency and continued reliance on fuel oil and solid fuels. Oil is used in 37% of Irish homes and 69% of rural homes. Meanwhile, the average Irish house is D-rated on the BER scale. Ireland is targeting the upgrade of at least 500,000 homes to a B2 energy rating and installing 600,000 electric heat pumps by 2030. There is also great potential to address these inefficiencies through district heat schemes. The revised NPF, the NDP and the newly announced Infrastructure Fund will play a key role in making this policy a success.

Heating

For Ireland to remain an attractive and competitive place to do business, the revised NPF must help support the decarbonisation of Irish industry. The mitigation options in this sector are costly and complex. There is no one solution, and the appropriate alternative fuel will largely be determined by individual production needs and location. Biomass, renewable biomethane, AD biogas, hydrogen, electricity, waste-heat use, Hydrotreated Vegetable Oil (HVO) and natural gas with carbon capture could all play a role. The wide range of technologies and solutions needed demands a flexible and technology neutral approach in national, regional, metropolitan, and local development planning.

Biomethane

There will need to be an acceleration in implementing the National Biomethane Strategy's 25 actions to achieve Ireland's 5.7 TWh biomethane target by 2030, with appropriate operational and capital financial support.

Renewable electricity

On the expansion of our energy capacity and the associated grid and generation infrastructure, there is an urgent need to progress North/South policy coordination to protect the Single Electricity Market, secure the island's energy supply and meet legally mandated net-zero climate action goals as outlined in NPO 73. As stated in Section 8, an Energy Futures 2040 scoping exercise should be undertaken to plan the future energy landscape and protect and strengthen the all-island Single Electricity Market, which has been integral to reinforcing energy security and integrating renewables. Urgently address delays in strategic energy and renewables infrastructure development due to planning and regulatory challenges.

Regional renewable electricity capacity allocations

The revised NPF proposes to facilitate the planning for the delivery of sufficient wind and solar energy development on a regional basis (NPO 75), which will then be translated to city and county development plans (NPO 76). Regional renewable electricity capacity allocations data are contained in the draft NPF. Clarity is needed on the methodology, how the calculations are made and regional apportionment.

Each Regional Assembly will be required to prepare Regional Renewable Electricity Strategy (RRES). The RRES is an interesting concept, but questions remain as to whether the Regional Assemblies are the appropriate body for developing these technical and complex strategies. This would have to be accompanied by considerable knowledge transfer from central government and industry bodies to the assemblies. Given the existing complexity in launching energy projects, we need to get this addition of a regional component that will deliver the planned accelerated roll-out right.

It is important that local authorities are not able to frustrate Ireland's ability to provide the necessary renewable electricity capacity. While setting capacity allocations can provide a framework for achieving the national RE targets, treating these targets as a fixed ceiling of development rather than a minimum level of ambition could lead to several unintended consequences, potentially hindering progress toward Ireland's achievement of its climate goals. It would

also be important that the RRES supports off-shore projects, through on-shore planning requirements in addition to solar and onshore wind projects.

We acknowledge that there will naturally be a level of attrition between lands zoned as open for windfarm development and those actually built. The reason could vary from landowner intention to wind resource on the site, to grid connection availability, to success in renewable support scheme auctions, to refusal of planning consent, to ability to raise finance or expertise to build the project. Thus, zoning the 'bare minimum' of MWs required under energy policy will not deliver those targets.

Water resource management

We must consider the availability of water, the capacity of the environment to receive treated wastewater, and our infrastructure capacity, when planning development. The requirement for sufficient water & wastewater capacity to facilitate not just housing growth, but renewable energy assets and port development, should be taken into account. Noting this, to facilitate a sustainable plan led approach Planning Authorities must adhere to ambitions in NPF, without exceeding them, to ensure infrastructure providers can provide capacity in line with the NPF (as referenced in the Employment Lands Guidelines OPR Practice Note PN04).

The NPF should set the strategic direction for protecting drinking water sources from future development. There needs to be a strong link between the NPF and the Water Framework Directive, drinking water source protection under the Drinking Water Directive and the catchment management approach generally throughout. The NPF should be developed in accordance with the River Basin Management Plan (RBMP), with a focus on the integration of water conservation efforts (e.g. rainwater harvesting) and efficient wastewater management activities (e.g. Nature Based Solutions) into development. The NPF needs to consider how emerging legislation will be catered for, such as the Recast Drinking Water Directive, the Urban Wastewater Treatment Directive and the Abstraction Legislation.

Implementing the NPF

Governance and oversight

Implementation of the NPF alignment with the NDP to deliver a comprehensive programme of well-prioritised infrastructure investment to underpin long-term sustainable growth. This alone won't lead to successful implementation, however. It will also require clear alignment with regional and local plans, and the establishment of coherence across the whole of government on place-making and regional economic development. New and/or enhanced governance structures (i.e. national, regional, and metropolitan levels) and performance metrics must be put in place.

The ESRI was tasked by the Department of Public Expenditure, National Development Plan Delivery and Reform (DPENDPDR) to examine the NDP. The report was published in January 2024 and found that despite the ambition that underpinned the NDP, the previous level of ambition may have underestimated what is needed (i.e. population growth is exceeding expectations). The report specifically addresses investment needs across the following areas – Housing, Energy, Transport, Healthcare and Education. The report set out broad principles which might be applied by Government in deciding how projects might be prioritised. These include better sequencing of projects and de-politicising infrastructure planning.

Work by the OECD and the subsequent report 'Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework' considered how national, regional, and local policies and governance arrangements can lead to more balanced regional attractiveness. In terms of NPF implementation, it highlighted the lack of formal mechanisms at national level, as well as how local authorities, the regional assemblies and other public bodies and agencies should act. It is disappointing that this work is merely acknowledged in the draft NPF without stating how it will inform changes to the governance and implementation mechanisms underpinning our regional growth ambition.

Statutory provision

The plan-making alignment process must be carefully managed by central government, the three Regional Assemblies and the Office of the Planning Regulator. Decisions must be based on a clear and transparent evidence base. Measures to re-think and re-vitalise urban centres must be promoted. This is consistent with core objectives of the NPF and the three RSEs in terms of ensuring an adequate supply of commercial and residential property, attractive areas to live, availability of skills and higher density, underpinned by required infrastructure.

NPF performance management becomes more important with the proposed change in the Planning and Development Bill, 2023 that formal reviews will take place one year after every two-census periods. An overall and detailed approach to performance management should be clearly stated in the draft NPF, which would be necessary to monitor broader regional and national policy objectives.

Establishing clear baseline data to monitor the performance of the NPF should be a priority in the revision process. There is little point in having an ambitious plan without a robust evidence base that can be monitored to ensure the quality of the design and implementation of the strategy, to assess its effectiveness, efficiency, and impact. It is important that data is regularly updated. Indicators can act as a state of play of local and regional competitiveness. Performance monitoring should not be limited to areas that are in direct local control of local and regional authorities. It is important that public bodies with a stake in the NPF implementation identify how specific objectives can be measured, and crucially make available data necessary to allow monitoring to take place.

Phasing

Whilst it is a long-term strategy, the revised NPF should phase targets in accordance with short-term and medium-to-long term objectives. For example, population targets should not be a cap on regional, local or metropolitan development. Meeting the real housing demand for the population will require the front-loading of housing targets, which would inform zoning considerations (e.g. increased zoning on greenfield at the edge of urban centres etc). Also, the phasing approach would need to be flexible to respond to the fact that not all land zoned is serviceable, there may also be viability issues, as well as acknowledging that compact growth targets may be slower to deliver given the complexities involved.

The performance of the NPF over its lifetime must be closely monitored, with a specific focus on local and regional performance. It must continue to ensure that the right conditions exist to allow the entire country to succeed. The results of each review should be incorporated into the RSES and the MASP, as well as local through the development plan process. However, corrective action must still be permissible outside of the periodic revision window of the NPF. Reviews should be coordinated to guide regional, metropolitan, and local development plans to be prepared and to continually inform national capital expenditure programmes.

One of the overarching principles for each NPF review must be to provide updated population and compact growth targets. Ongoing performance monitoring metrics should be developed and put in place. Everyone should be able to monitor progress of the NPF and to see its implementation right down to the local level.

Consideration should be given to extending the remit of the Regional Development Monitor (RDM) Hub to include this. We would welcome the addition of new areas to the RDM Hub, and greater buy-in of public bodies to provide open-data to assist in performance monitoring. However, links to relevant websites, such as RDM but also the OPR and myplan.ie, and relevant data sources should be included on the Project Ireland 2040 site.

The planning system

The success of the Planning and Development Bill 2023 will be determined on how it delivers in housing and infrastructure. Certainty must be built into the planning system (e.g. statutory timelines) to deliver housing, infrastructure, and business investment. The NPF must be clear in its objectives, and these reflected with necessary clarity right through the planning hierarchy right down to local authority development plan level.

Ireland is facing increasing capacity constraints such as in underpinning infrastructure. Housing and infrastructure are interlinked in terms of immediate housing delivery and our longer-term sustainable development objectives. For example, certainty is urgently needed over exempted development, which is moving from primary to secondary legislation. Consultation with infrastructure providers should occur on drafting the new regulations. Transitional arrangements will be provided for, but it is important that a detailed timetable for production, and subsequent enactment of all regulations stemming from the new legislation is required.

Ireland's planning system must be responsive and resourced. There must be a concerted focus on ensuring the necessary resources are in place at all levels

of the planning system. Failure to have the necessary resources in place threatens the achievement of objectives under the NPF. For example, delayed permissions for underpinning infrastructure or transport infrastructure in the case of TOD, will prevent housing targets from being met. It is important that delays at An Bord Pleanála/An Coimisiún Pleanála must become the exception rather than the norm.

Phased implementation, targets and timelines are a feature of the NPF. Projects or development type included in or consistent with the NPF, RSES, MASP or local development plan should be treated as a priority should it come before An Bord Pleanála/An Coimisiún Pleanála. Developers and infrastructure project promoters should be able to have clear sight on precisely where projects are in the decision-making process. Projects represent important investment decisions. Information should be made available in a transparent and equitable manner indicating where projects are precisely in the process and provide an indication of the decision timeline.

Regional spatial and economic strategies

The revised NPF must include a statement on how changes will be incorporated into each RSES and how will they result in variations of local development plans. Details will be needed on the expected timetable for each stage of alignment to occur. The planned move to ten-year local development plans will require a statement on how this change would impact their alignment with and future NPF reviews, as well as RSES revisions.

Metropolitan area strategic planning

At the core of the Metropolitan Area Strategic Plan (MASP) concept is the recognition that functional economies act across local and county boundaries. Effective utilisation of this concept can deliver balanced, sustainable, and plan-led growth. It is surprising to see that this section has been cut back from the original published back in 2018.

An implementation body has been established for each of the MASP areas. They have been tasked with coordinating and monitoring implementation of the MASP. The precise role of these bodies is vague; beyond the general objective of overseeing and driving implementations of the MASPs. The revised NPF must clarify how a MASP is to interact with their respective Regional Spatial and Economic Strategies (RSESs) and local development plans. It is also important to clearly state how the MASP framework and the implementation framework facilitates spatial coherence and enables strategic decision-making amongst the various local authorities that may be situated across the metropolitan area (e.g. 7 local authorities within the Dublin MASP).

Detail is still lacking on the exact membership of the five MASP implementation bodies. This is simply insufficient. The widest expertise should be sought from internal and external sources in transport provision, housing, infrastructure delivery and industry. It is important that the views of business and the wider economy are represented as this is both a 12-year spatial and economic strategy.

It should also be recognised that key functions and delivery responsibilities related to the implementation of the NPF at a local level often are often outside the scope of local authorities. Co-ordination models should be introduced at the MASP and constituency local authority level. Such an example of a local model is the Eirgrid Dublin Infrastructure Forum, which consists of the four local authority CEOs, public bodies across Dublin, utilities and transport operators and authorities. This group exists outside the MASP structure but is designed to coordinate the delivery of a key infrastructure project, which would benefit the delivery of NPF targets.

Integrated spatial and transport planning

The revised NPF is prioritising Transit Oriented Development (TOD) for the five metropolitan areas. Clarity will be required on whether housing can be delivered prior to the delivery of the targeted transport project(s). Transport projects involve significant lead times and planning delays. Reference should also be made to the fact that this TOD-led prioritisation is being targeted for development post-2030.

TOD must not be confused with broader infrastructure-led principles, which would better inform strategic land assessments. It is critical that TOD is not envisaged as the singular basis of growth planning. Providing other critical and underpinning infrastructure such as water and wastewater services is extremely complex and there should be no assumption that the provision of water services can be backfilled into TOD locations.

Better strategic planning for urban areas

The Planning and Development Bill, 2023 introduces three types of area-based plans. These go beyond the traditional Local Area Plans, and include Urban Area Plans for compact growth areas, Priority Area Plans for housing, regeneration or renewal, and Coordinated Area Plans for towns located across two local authority areas. It is important that the NPF provides clarity that Priority Area Plans can be prepared for certain strategic areas which do not consist of dwellings, which may not qualify as a 'settlements' as set out in the legislation.

The new legislation is also introducing the Urban Development Zone (UDZ), which is to be an important device to activate strategic brownfield and urban infill sites as well as to coordinate the provision of the necessary underpinning infrastructure. However, the Bill does not make provision for mechanisms to provide for a coordinating body (e.g. development company model). Significant areas earmarked for development by the UDZ model include the City Edge Project, which is predominantly privately-owned land. Significant investment may also be required by the State to enable land acquisition or assembly, including by compulsory purchase or to facilitate the relocation of commercial enterprise to other locations. The UDZ model will lead to transformation, however time will be a significant factor. These can be complicated and complex models to establish and are a significant departure from the SDZ model. For example, the City Edge Project is not projected to deliver homes, outside of those already being planned by the LDA, prior to 2040.

Coordinating land use zoning, infrastructure and services

The housing target of 50,000 homes per annum contained in the draft NPF does not include pent-up demand. Targets are also backloaded, whereas the demand for housing is so pressing that maintaining this position is only likely to exacerbate this situation further.

The Residential Zoned Land Tax (RZLT) is designed to only target land not in use or seriously under-utilised, which would better support housing. However, it is unclear how the RZLT ensures the necessary underpinning infrastructure is in place, which could support development. The RZLT is still being developed and problems have been highlighted with it. These may be subject to further revision, which may or may not limit its ability to truly make land available for development. It should also be acknowledged that there is no current legislative basis for the Land Value Sharing proposals, which draft legislation has not progressed and the UDZ part has subsequently been incorporated into the Planning and Development Bill, 2023.

The provision and capacity of utilities plays a critical role in residential development. Much has been made regarding the amount of zoned land available for residential development. The reality, however, is that not all this land is in easily developed brownfield or greenfield sites, serviced by critical infrastructure, water and public transport. Increased investment by public utilities and increasing the provision of capacity of Uisce Éireann networks serving development land is key. It is also important to reiterate that TOD must not be confused with broader infrastructure-led principles, which would better inform strategic land assessments.

The availability of underpinning infrastructure is critical to determining the potential housing yield from sites, level of infrastructure serviceability, and potential timelines for zoned-land activation. Strategic land reserve assessments should be undertaken by all local authorities. Government must factor the level of serviceability in its review of greenfield development. Sites which can deliver housing in the coming years should be prioritised for development.

Funding for utilities is crucial to allowing better planning of our national development. This is to ensure that capacity is available to meet on-going demand and that zoned land is serviced in advance of development. Given rising costs, utilities and infrastructure providers must be given adequate funding to deliver on maintenance and upgrades – as well as new projects in their capital programme. Government must increase the capital spend on utility infrastructure to allow better forward planning of housing delivery.

The recent commitment to the Water Supply Project, Eastern and Midlands Region is to be welcomed. Continued backing will be required to this enabling infrastructure is in place to support sustainable growth across the economy and society. Timely delivery will bring significant benefits to a region that is home to half the population of Ireland. Delayed delivery will threaten the country's ability to meet our housing targets.

Prioritising development lands

Land zoning must be led by, and informed by, infrastructure development. The premise that it is inefficient and harder to provide transport links and infrastructure to greenfield does not sufficiently consider existing services proximate to these locations, but where the site does not fall within the existing footprint, nor well-designed communities incorporating new quality infrastructure, including social and transport infrastructure. Key growth-enabling infrastructure projects identified in each RSES, including the MASPs, which support the sustainable development of our metropolitan areas, regional growth centres, and 'key towns' should be included in the revised NPF.

NPO 102 should be amended to include "real-time" monitoring of compact growth in cities and larger settlements. This should provide support evidence-based decisions on whether local zoning or land-use plans need to be adjusted in the case of under or over delivery on set objectives. Completing the long-awaited digitalisation of the planning system is urgently required.

Public capital investment – The national development plan and national strategic objectives

Investment in public infrastructure is fundamental to creating the necessary conditions for economic prosperity for the benefit of society. Underinvestment over recent years has depleted the country's stock of critical infrastructure, further widening the range and number of areas that have become urgent investment priorities. An aligned NDP with a revised NPF should deliver a comprehensive programme of well-prioritised infrastructure investment to underpin long-term sustainable growth.

It is important that Government through the NDP would provide the necessary infrastructure and investment to reimagine our cities, towns, and regions. The revised NDP must provide the tools to help reimagine and revitalise our cities and towns and maximise the new and unexpected employment and investment opportunities for our regions. Population growth tends to follow employment growth, which itself required investment in infrastructure to achieve. This can only be achieved through targeted and ambitious investment, and in particular connectivity, across our regions. Government must review the approach adopted in prioritising enabling infrastructure to ensure that it is consistent with the spatial objectives of the NPF and to further prioritise investment in key locations to deliver on the ambition for regional balance. Additionally, the significance of critical digital infrastructure has therefore never been greater and is a priority area of further investment allocation.

We must plan better to achieve increased ambition on climate change. Because infrastructure built today will affect our emissions profile in 2050, it is critical that the NDP is fully climate-proofed and does not become an obstacle to transition. Too often, major infrastructure projects and developments are pursued without considering the carbon footprint, current and future energy requirements, and the opportunities for mitigation. The NDP, by adhering to the climate smart planning principles of the NPF, will become the main driver for effective climate action in the years to come.

The role and scale of the State will be greater than before and addressing quality of life challenges in areas such as housing, environment, health, childcare and commuting will become a much more important factor in life satisfaction, and ultimately national competitiveness and prosperity. We must ensure adequate funding for capital investment in utilities such as in water, wastewater and the completion of water projects of national importance (e.g. Water Supply Project Eastern and Midlands Region, as well as the Greater

Dublin Drainage Project) to support sustainable and compact growth set out in the revised NPF.

We must continue to invest upskilling, reskilling, and labour market initiatives to meet the requirements of each region, as well as addressing the long-term underfunding of higher education which continues to pose a significant threat to national economic competitiveness. Finally, the most effective policy response to the current economic competitiveness challenges is to drive greater innovation intensity across all regions. Greater investment across these areas will support objectives to be set out under smart specialisation in the revised NPF.

The NDP will not be reviewed until after the forthcoming general election. It is important that the outcome of the review supports the provision of the necessary infrastructure and investment, as well as potential new delivery and funding models, to reimagine our cities, towns, and regions and wider NPF objectives. It should also be in line with the ESRI review of the NDP future cost-benefit analyses and infrastructure budgeting should consider the inflation easing, supply-side impacts of some investments. Aligning the revised NPF with the NDP must also provide clear direction via sectoral strategies, which are developed in line with each national strategic objective. Government departments must be able to effectively develop sectoral investment frameworks in line with the revised NPF, and to identify specific projects.

Any reprioritisation of projects under the NDP must be justified and be accompanied by better delivery. Successful delivery of NDP projects and programmes necessitates a strong focus on the improving management and governance of public investment. It also requires a commitment from Government to focus on desired outcomes and a willingness to work with regional and local stakeholders, public bodies, commercial semi-states, and industry to address the barriers to delivery.

A growing number of major infrastructure projects under the current NDP have been delayed in recent times for lack of relatively small amounts of funding to move through the approvals process. This is particularly true of transport projects where many projects are stalled at the early phases of the 6 phases to project implementation. It is vital that funding is released early to allow projects to move through appraisal, selection, design, planning and procurement on time or ahead of schedule where possible.

Priorities for public capital investment and the NDP in terms of delivering for the revised NPF include:

- > Deliver a comprehensive, planned, and sequenced programme of well-prioritised infrastructure investment underpinning long-term sustainable growth and balanced regional development.
- > Extend future NDP cost-benefit analyses and infrastructure budgeting to consider the inflation easing, supply-side impacts of some investments.
- > Ensure better delivery on infrastructure projects by improving project management and governance of public investment; and working with regional and local stakeholders, public bodies, commercial semi-states, and industry to address the barriers to delivery.
- > Accelerate project delivery timelines by making required changes to public procurement, planning, compliance processes and project delivery mechanisms.
- > Deliver strategic projects of national importance, which underpin economic growth, sustainable development, and contribute to our climate targets.
- > Embrace innovative and diversified funding streams, including strategic utilisation of EU funding sources, enhanced engagement with the European Investment Bank, a pipeline of non-exchequer funding of infrastructure, and developing new models (e.g. City Deals) to fund urban transformation, in addition to the URDF and RRDF funding streams.

National Strategic Outcome 1: Compact Growth

Strong and ambitious targets for compact growth must be over the longer-term and set the overall vision beyond 2040. This is due to the delivery challenges, cost, viability issues, and realistic longer timelines with brownfield development and urban infill. Continuing to expect brownfield development to bring housing on stream over the short-term and at the same time further constraining greenfield development within and/or close metropolitan areas, regional growth centres and ‘key towns’ is likely to result in housing targets being missed, compounding the housing crisis further. In short, we need to combine national targets with local delivery models and more flexibility in development plans over the coming years.

Compact growth and urban infill cannot be delivered overnight. It must be planned for and invested. The revised NPF must remain steadfast in its commitment to support the sustainable development objectives at its heart. Compact, urban growth, not ineffective low-density measures, must be implemented through effective alignment of local development plans over the lifetime of the NPF, the RSEs and the MASP. It will be delivered in phases, with an expected ramping up of housing delivery over the second half of the NPF and beyond 2040. Delivery must be coordinated and requires improved regional and metropolitan implementation bodies, as well as alignment with NDP priorities and the active involvement of infrastructure and utility providers.

Targets for compact growth must be led by, and informed by, infrastructure development. The premise that it is inefficient and harder to provide transport links and infrastructure to greenfield does not sufficiently consider existing services proximate to these locations, but where the site does not fall within the existing footprint, nor well-designed communities incorporating new quality infrastructure, including social and transport infrastructure. Key growth-enabling infrastructure projects identified in each RSE, including the MASP, which support the sustainable development of our metropolitan areas, regional growth centres, and ‘key towns’ should be included in the revised NPF.

Zoning decisions within local development plans should inform capital expenditure decisions on supporting infrastructure to unlock development sites. In addition, Government initiatives such as the URDF, Croí Cónaithe, and Project Tosaigh should be actively targeted at advancing the serviceability

of zoned land and to address site viability issues, especially for apartment construction. Development plans should be the basis of a local authority's interaction to strategically target national and European investment funds to increase housing supply. This will require strong engagement with property industry stakeholders.

The NPF retains the target of 40% of projected growth on brownfield lands. While we recognise the intention behind this aspiration, it presents enormous challenges to the delivery of housing, particularly considering the existing challenges with a 50:50 split in the cities. A more balanced approach should be pursued which allows for growth in other areas as well, especially over the short-term, (i.e. areas with accessibility to existing or planned public transport etc), which are not necessarily brownfield.

Activation rates of zoned land in a Development Plan cycle rarely exceed 30%. While figures for brownfield sites are not available, our view is that activation rates on such sites are lower again, due to costs, infrastructure constraints, title complexities etc. This must be acknowledged in the NPF in the reconsideration of headroom as enhancing the focus on brownfield sites will merely augment housing supply deficiencies in the short to medium term.

Sustainable and resilient planning for our urban centres will require sufficient focus on allowing people to live close to where they work, consume public services, and benefit from improved infrastructure. However, the compact growth targets only refer to houses; they take no account of places of employment as important to support communities. We must ensure that there is the need to ensure the adequate supply of zoned land for industrial use elsewhere in the local or metropolitan area to facilitate urban infill and brownfield development. Certain local authorities with the support of the MASP and RSES may have to zone at the edge or periphery of an urban area (e.g. greenfield development) to provide sites for industrial activity, which may not be suitable for the intended mixed-use and higher density urban areas.

Compact growth targets must ensure an adequate supply of commercial and residential property is available, or can be provided, in our urban centres. Questions remain over the monitoring of planning decisions impacting on compact growth. For example, there are cases of large-scale housing developments and tall buildings being refused planning in areas designated for compact growth.

Project Ireland 2040 introduced four new competitive funding streams: Urban Regeneration and Development Fund; Rural Regeneration and Development Fund; Climate Action Fund; and the Disruptive Technologies Fund.

Competitive funding streams such as these can improve the effectiveness of regional, social, and economic development strategies. The URDF and RRDF should be expanded and better promoted in line with the revised NPF. Successful draw-down of these funds will require strong local public-private partnerships. It is important that all local stakeholders are engaged early in the development of proposals. These funds alone, along with current NDP commitments are unlikely to result in the achievement of the core objectives under the NPF.

The revision of NPF should be an opportunity to explore potential new delivery and funding models, to reimagine our cities, towns, and regions. The NPF should provide commitment to embracing innovative and diversified funding streams, including strategic utilisation of EU funding sources, enhanced engagement with the European Investment Bank, a pipeline of non-exchequer funding of infrastructure, and developing new models (e.g. City Deals) to fund urban transformation

Land activation and land management

Blanket re-zoning of land from industrial and commercial use to mixed-use should be strongly discouraged. It causes a degree of tension with NPF objective for a strong economy supported by enterprise, innovation, and skills (NSO 5), as well as the objectives for regional spatial and economic development (i.e. RSEs) and the MASPs. It is important that an appropriate balance in land-use is achieved throughout the planning hierarchy. The recently introduced Residential Zoned Land Tax (RZLT) is designed to only target land not in use or seriously under-utilised, which would better support housing. However, it appears that there is some confusion between certain low-intensive industrial activities and under-utilisation. Local authorities must clearly set out their interpretation of enterprise/industrial criteria used in development plans terms of economic use of a specific site. Unintended consequences of compact growth targets being implemented at local level must be avoided. For example, certain business activities may disappear from the local community altogether, with no guarantee (i.e. site suitability) that more intensive economic activity or housing would be achieved on the site.

National Strategic Outcome 2: Enhanced Regional Accessibility

The revised NPF must continue to prioritise actions to deliver enhanced regional accessibility. This requires a concerted focus on investment and delivery infrastructure that supports regional accessibility and connectivity, including the shared island agenda. The combined potential of our regional cities is key in creating a counterbalance to Dublin and achieving effective, balanced regional development. Commitments made in the revised NPF to improved inter- and intra-regional accessibility, as well as to international connectivity through our ports and airports must be significantly strengthened. Transport infrastructure must be more connected, integrated, and efficient.

Investment in critical infrastructure in the regions that enhances inter-urban connectivity and accessibility is more important than ever. Any shortcoming in regional transport infrastructure could hinder investment and job creation, notably enhance regional inequalities, and undermine the delivery of the NPF. The removal of barriers to delivery for critical infrastructure is imperative.

Enhanced accessibility to the North-West will be essential to secure the long-term future economic wellbeing of the region. The lack of investment in transport infrastructure in the North-West over many decades has left the region lagging other parts of the country. Out of the 234 designated regions across the EU, the North-West region ranks at 218th for infrastructure. It must also be recognised that the North-West has been downgraded by the EU from a ‘developed’ to an ‘in transition region’ since the NPF was published in 2018.

Rail is a core component of supporting sustainable inter-regional connectivity. It has the potential to be a social and economic catalyst for the regions that will deliver benefits to the economy, quality of life and the environment. The All-Island Strategic Rail Review must address the ongoing challenge of regional accessibility and unlock the wider value that joined up inter-regional and all-island rail connectivity would bring.

Transport infrastructure, including rail and road, are needed for a flexible, intermodal, integrated and sustainable transport system. Such an infrastructure-led approach would better enable us to achieve our regional growth and ambition targets. The revised NPF must provide a firm commitment for the provision, maintenance, and upgrade of rail and critical

road infrastructure projects, without which the inter- and intra-urban transport strategies would be sub-optimal.

Unnecessary delays to projects, which support the achievement of enhanced regional accessibility, would simply reinforce regional inequalities. Planning is a significant issue. However, a growing number of major infrastructure projects under the current NDP have been delayed in recent times for lack of relatively small amounts of funding to move through the approvals process. This is particularly true of transport projects where many projects are stalled at the early phases of the 6 phases to project implementation or because of sequencing of investment in accordance with a modal or intervention hierarchy. In fact, certain strategically important projects (e.g. M20 Cork to Limerick, M28 Cork to Ringaskiddy etc) are delayed due to the budgetary allocation process to Transport Infrastructure Ireland. The revised NPF through NSO 2 must ensure that regional connectivity is seamless and promotes multi-modal connectivity. It must support the ambition to be an enabler of regional growth.

The revised NPF must champion densification if we are to address parallel issues such as the cost of living and sustainability. At the heart of this will be transport oriented development which should draw distinction between improved mobility vs. improved liveability. This requires an increase in sustainable mobility options, including public transport and active travel, as well as efforts to decarbonise the transport sector more generally.

National Strategic Outcome 3: Strengthened Rural Economies and Communities

One of the most effective means of stimulating rural economies is by investing in infrastructure including increased sustainable transport options and broadband. The expanding digital economy plays an increasingly crucial role in the exchange of goods and services, accessing public and essential services, as well as sustaining new ways of working (e.g. remote/hybrid working). Businesses and individuals benefit from good broadband connectivity, that many parts of rural Ireland will only enjoy with the roll-out of the National Broadband Plan. The revised NPF must continue to champion the deployment of new or cutting-edge telecommunications infrastructure such as, but not limited to, 5G across all regions and local areas.

National Strategic Outcome 4: High-quality International Connectivity

The Irish economy is heavily reliant on international connectivity provided by our ports and airports for both transit passengers and commercial freight. Our ports and airports should be duly recognised as strategic national assets whose growth further enhances our international connectivity, underpins regional development and support Ireland's trade-intensive economy. International connectivity has been a cornerstone of our national economic and trade policy. It is a critical enabler for our economic growth, prosperity and employment. Proper spatial planning must maintain and develop as specified, not restrict, the future development of our ports and airports.

While our international connectivity plays an essential role in our continued economic prosperity, especially in the experience economy, supporting passenger mobility is important for wider economic activity beyond tourism. Our continued prosperity is dependent upon the access to global markets it provides – both in the inflow of foreign-born talent to Ireland's high-skilled labour market and the outflow of high-value exports. In recent years, the Irish economy has witnessed spectacular employment growth (14% versus an EU average of 3%). A record 2.7m people are currently employed across the economy, with migration playing a key role in meeting the growing demand for skills and talent, with almost 1 in 5 of the national workforce being foreign-born. International connectivity is essential for keeping people, businesses and markets connected across the globe. It contributes to attracting and retaining Ireland's increasingly international labour pool, including an increasingly mobile workforce.

Airports

Upgraded facilities underpinning surface accessibility to our airports will be integral to the sustainable operation of our international gateways as they become multimodal transport hubs. We support the proposed development of new heavy rail connections to state airports – with the Clongriffin spur and rail link to Shannon Airport allowing for seamless airport connectivity. The complementary Metrolink will also transform connectivity from the city centre to Dublin Airport with the planned Ground Transportation Centre supporting a modal shift to sustainable transport modes in anticipation of Metrolink coming on stream.

Our regional airports will play an ever more important role given the predicted growth of population in the regions outside the Eastern Region. Cork Airport and Shannon Airport are important contributors to enhanced regional accessibility (NSO 2). Utilising existing capacity across our state airports alongside continued investment in our smaller regional airports beyond 2025 would support a key pillar of balanced regional development and quality of life. There is also a strong case for extending financial support to the two regional State Airports - consistent with EU Regulation 2017/1084.

Strong Government backing for national strategic aviation infrastructure investment will be essential going forward. Planning stakeholders are unambiguous as to their role in supporting this infrastructure. It is vital that our airports be allowed to expand in line with projected economic and demographic demand without unduly restrictive planning conditions - such as those currently impacting Dublin Airport. There is greater clarity needed around the timelines and prospective outcome of permitting and consent applications to allow for long-term infrastructural planning. Given the prominence of careful land-use management at land-side areas, rezoning requests for land near Dublin Airport have been refused by authorities – meaning they do not have adequate zoned land to meet its infrastructure needs in key locations on the airport periphery. Seemingly self-defeating decisions such as this and the clear imbalance in jurisdiction over airport infrastructure must be addressed. The revised NPF should specify that operators of strategic infrastructure assets should maintain full autonomy over asset management decisions.

Ports

Given the proximity of our Tier 1 & 2 ports to large population centres, accessibility to them for logistic and transitory purposes should be improved. However, they often operate in confined urban areas with a finite amount of space for development. Their role in supporting a number of our national objectives should be given weight when alternate use of potential port lands is considered.

It is becoming ever clearer that Irish maritime infrastructure is not keeping pace with the nation's projected economic or demographic growth. It is on track to underserve a trade-intensive island with a robust economy that warrants effective infrastructure to futureproof it. Port operations maintain a specific interconnectedness with the broader economy and facilitate enterprise further down along the supply chain. Citizens, businesses and society at large across the island will benefit from timely delivery of expanded

port capacity and the bolstering of the climate resilience of these strategic assets.

Due to the often-seamless operation of our ports, they remain a far away and invisible aspect in the lives of citizens. However, public awareness on the necessity of expanding port infrastructure will be required going forward – especially in a context of land scarcity in urban areas and resistance to new infrastructure along coastlines on environmental grounds. Ports should be afforded necessary state supports to ensure robust climate resilience upgrades as environmental or social improvements seldom generate returns appealing to private finance. In the time since the publication of the 2013 National Ports Policy, the EU is encouraging the bolstering of European ports infrastructural resilience through omitting the construction of breakwaters, dredging etc. from state-aid rules.

National Strategic Outcome 5: Sustainable Mobility

A commitment to sustainable mobility and transit-oriented development starts by building a user-friendly integrated intra- and inter-urban public transport system alongside considerable investment seen in active travel. The development of this core network of sustainable mobility and active travel is essential as maintaining current car-centric development patterns that undermines other sectoral and strategic goals set out by Government.

The modal shift envisioned through the enhanced rail network outline in the AISRR will reduce journeys in private vehicles – tackling the chronic congestion in Irish cities and towns which is contributing to hours of lost productivity. Rail must compete against the convenience and cost of the road network and central to this will be the planned speed increases to 200kmph on key intercity corridors. The integration of bus services with future rail infrastructure will be integral to ensuring that underserved regions are not left behind in terms of public transport. Where rail cannot not feasibly service communities, other sustainable transport modes should offer connectivity to the rail network. These sustainable transport solutions enable the compact transport-oriented development which will serve our growing urban populations. However, given the long-term nature of changing development patterns and the long lead times of the projects, it will be necessary to ensure the maintenance and upgrading of existing national and regional roads as not to punish captive car users while no suitable alternatives are in place.

Improving mobility between dormitory commuter towns and areas of higher employment is a clean-cut aspiration – while creating strong towns and cities in the vein of 15-minute cities with employment opportunities, amenities, and necessary services all easily accessible through sustainable transport modes is a more complex challenge for the NPF. The revised NPF is an opportunity to encourage the development new long-term strategies for urban spaces based on accessibility to amenities and services. This replaces previous thinking of designing cities from solely the logic of mobility, which has led to unsustainable commuting patterns. It is important the revised NPF sufficiently prioritises the reimagining and revitalisation of our town and city centres. This can be achieved by supporting retail and encouraging increased mixed-use planning in our city and town centres - achieving a better and more appropriate balance between residential, retail, and other commercial or business activity.

The Climate Action Plan recognises fleet electrification or conversion to renewable transport fuels (RTF) as the best short-to-medium term means of emissions abatement. It is becoming ever clearer that Irish alternative fuels infrastructure (AFI) is not keeping pace with projected demand or technological advancements. Government will need to provide an action plan to address the emerging imbalance between current projected ZEV sales and stated government targets. Industry can serve as a willing partner to address availability and interoperability challenges should be appropriately involved in policy development. Policy certainty will be at the heart of the successful delivery of alternative fuels infrastructure and will be needed to mobilise zero carbon investment and accelerate fuel switching in businesses and households. A challenge for the Revised NPF will be to highlight where the delivery of minimum AFI requirements falls within the planning and strategic objective hierarchies.

The measures outlined in the Draft Strategy & Implementation Plan of the National Demand Management Strategy (NDMS) will go a long way to support our NSOs. Knock-on effects will contribute to broader national objectives such as the promotion of sustainable and transit-oriented development, improved density in urban areas and improving liveability through reductions in noise and air pollution while cutting congestion which leads to hours of lost productivity in the economy. Given the persistent challenges in the operating environment for businesses, particularly those in urban centres, proposed changes to access routes stemming from the NDMS will require adequate consultation. Alterations to logistical access routes require forward planning with suppliers and customers should be advised as to alternate access routes. Plausible short-to-medium term carbon reduction measures can include adjusting existing regulations to slightly increase trailer sizes for deliveries - reducing the number of trucks on the road and thereby helping to alleviate congestion caused by frequent deliveries. We support the commitment to community engagement measures but stress the need for timely notice to be relayed to local business in particular – clearly outlining proposed changes and relevant timelines.

Strategic transport infrastructure projects are continually burdened with additional costs and delays stemming from planning objections. Large infrastructural undertakings must also be sequenced accordingly relative to national importance in the planning system in a reformed An Coimisiún Pleanála. These delays also impact projects of a non-intensive nature such as BusConnects and active travel improvements, delaying national modal shift targets and not allowing for suitable alternatives to private vehicle transport in large parts of the country in the face of demand management measures.

National Strategic Outcome 6: A Strong Economy Supported by Enterprise, Innovation and Skills

The revised NPF must be guided by the Enterprise White Paper. There should be a greater prioritisation on enterprise and employment in the revised NPF. It must address the strategic drivers for change, which include climate transition; digitalisation; hybrid/remote working; changing commercial mix of our city and town centres; infrastructure-led development; the delivery of infrastructure, and the all-island economy.

All regional, metropolitan, and local development strategies must support enterprise growth and inward investment across the country. Ultimately, the output of these plans must be an adequate supply of commercial and industrial property. This must inform zoning decisions, with the recognition that heavy industrial operations or manufacturing sites are not suitable for inner city areas. These should be sited close to and/or on the periphery of urban centres. This is likely to require development on certain greenfield sites, as compact growth policy has targeted existing brownfield sites for the supply of new homes along with commercial activity which are more suitable for high-density, mixed-use locations. Through the revised NPF and the RSEs, each local authority should conduct strategic land assessment for commercial and economic use with particular focus on place- and site-specific requirements of certain industry sectors, infrastructure requirements and level of serviceability, so that an adequate quantum of land can be zoned accordingly.

The rapid acceleration of hybrid and/or remote working presents challenges to our urban centres. It is important the revised NPF sufficiently prioritises the reimagining and revitalisation of our town and city centres. This can be achieved by supporting retail and encouraging increased mixed-use planning in our city and town centres. Over the years, peoples' shopping habits have shifted. Retailers across the city are facing challenges of online shopping, new shopping destinations in neighbouring local authority areas and people who want to shop later in the day and after work. The priority from the NPF is on urban infill, providing more housing on brownfield sites and in the urban core. However, more homes will require more amenities across all times of the day.

The revised NPF must support the support the development and enhancement of the local experience economy. The experience economy encompasses hospitality, retail, travel, food, drink, tourism, entertainment, technology, events, and organisations in the arts, cultural, sporting and heritage sectors, supporting regional and rural development directly and through their value chains. This can be achieved through the development plan process, and the MASP if applicable, and supported by other local initiatives. It is interconnected with other measures such as tourism, the night-time economy and addressing the commercial mix within the city core. Ultimately, each locality must be safe, family- friendly and attractive for inhabitants and visitors alike.

The night-time economy is a core component of the wider Experience Economy and will be key to revitalisation and growth of the cities, towns, and villages nationally. Local authorities will play a key role in ensuring policies, planning and local regulations will support the growth of the night-time economy. Specific recommendations for urban planners are contained in Government's Night-Time Economy Taskforce report, as well as work underway in the 9 designated night-time economy pilot cities and towns across the country. Local public realm enhancements to support a safe, night-time economy include better street lighting, safe transit hubs, and specific requirements designated by An Garda Síochána.

Local authorities must take the broadest view of the night-time economy, covering activities between 6pm and 6am. This is in keeping with work done in cities across the globe. It is more than just cultural and leisure activities and builds on existing efforts to create 24/7 liveable cities and urban centres. Actions involve rethinking the use of public space; reimagining under-utilised space; and amending the urban design policy to incorporate the needs of the night-time economy into the plan-making process. Innovative approaches to noise control and sound management should be explored. Policymakers, particularly those in local authorities, should engage with their international peers to identify best practices.

Safety and security affect the attractiveness of our cities and towns. The region's city and urban centres, and public spaces must be safe and usable for all inhabitants, especially women, older people, ethnic minorities, and marginalised groups. Safety concerns, both real and perceived, limit access to urban centres, including to employment, health, education, political and recreational facilities. It impacts footfall, and passive surveillance. Our cities and towns must be viewed as safe and secure for inhabitants, workers, students, visitors, and tourists at all times of the day.

Supporting entrepreneurialism and building competitive clusters

According to *National Clustering Policy Report (2023)*, there are 45 business clusters on the island of Ireland fostering talent attraction, innovation and knowledge sharing among businesses. The Department of Enterprise, Trade and Employment is to develop a whole-of-government approach to clustering to sustain and develop competitive advantage in areas of strategic importance and potential, in particular the twin transitions of green and digital. Clustering is important to regional economic development and as such actions should be designed in line with the *National Smart Specialisation Strategy for Innovation (2022-2027)* provides a framework to coordinate regional and national actors to pursue dynamic, bottom-up innovation. Smart specialisation (S3) is an important mechanism for unlocking the growth potential of Ireland's regions by addressing imbalances and underperformances and supporting the development of existing and emerging industry clusters.

Sustaining talent and boosting human capital in all regions

It is important that Impact 2030: Ireland's Research and Innovation Strategy is specifically recognised in this NSO. The national research and innovation strategy seeks to make Ireland an 'Innovation Leader' by 2030. A vibrant research and innovation ecosystem is an important lever for driving Ireland's international competitiveness and has supported Ireland's leadership across a range of industry sectors. Progress will require serious Government commitment to investing in world-class innovation infrastructure. There is an urgent need for a long-term financial commitment to the upgrade, maintenance, and development of national research infrastructure, notably those in further and higher education facilities. Without a significant shift in Ireland's strategy towards innovation infrastructure investment, Ireland's economic potential, balanced regional development as well as our ability to attract and retain FDI, and to create, grow and scale indigenous enterprise will be undermined.

Digital and data innovation

The revised NPF must continue to champion the deployment of new or cutting-edge telecommunications infrastructure such as, but not limited to, 5G across all regions and local areas. Digitalisation can also enable the development of smart cities and smart regions, as well as enhanced public services.

Ireland must continue to develop cloud infrastructure. The country will be positioned to exploit the benefits of the digital economy, sustaining investment and growing employment. It would support the digitalisation of

public and private services that inhabitants can access and in enabling the achievement of national and shared EU targets for this digital decade. It is important that the revised NPF supports, not hinder, the development of data centres. The positive reinforcement in the previous NPF is now being diluted and in place totally omitted. The revised NPF must be consistent with Government policy as recognised in the *Government Statement on the Role of Data Centres in Ireland's Enterprise Economy (2022)*, *Harnessing Digital*, *The Digital Ireland Framework (2022)*, *Powering Prosperity – Ireland's Offshore Wind Industrial Strategy (2024)* and other policy statements, including the EMRA RSES (RPO 8.25). Diluting the existence of, or simply omitting reference to, data centres as proposed in the revised NPF is inconsistent with the stated objective of a strong economy and employment, whilst effectively responding to the drivers of change, namely the twin digital and green transition.

National Strategic Outcome 7: Enhanced Amenities and Heritage

Ireland needs to embrace a greater diversity of funding and co-funding options. We must build on our past track record of successfully utilising funding from the European Union to support development right across the country. The ERDF is one funding programme, but a full assessment should be conducted in line with this national objective to identify additional funding source that on their own or by being blended could support the large-scale adaptive reuse of our vacant built heritage stock and drive the regeneration of cities and towns.

National Strategic Outcome 8: Transition to a Low Carbon and Climate Resilient Society

The Russian invasion of Ukraine and resulting European energy crisis has brought renewed attention to Ireland's overdependence on imported fossil energy, the lack of emergency gas storage, and the economy's high exposure to international gas prices. While emergency solutions will get us through this difficult period, these solutions come with added costs to consumers and the environment. The revised NPF must align with the full delivery of the *Energy Security in Ireland to 2030* strategy (2023). The revised NPF should also reflect that the limited gas storage available to Ireland in 2018 has since been decommissioned, which poses a security of supply risk and exposure to seasonal fluctuations in gas prices.

While there was strong ambition shown in the Climate Action & Low Carbon Development Act, Ireland is now at risk of missing its energy decarbonisation targets by a significant margin. Commitment to scale up public funding for the modernisation and decarbonisation of energy networks alongside better all-Island and regional cooperation on energy can help to this end. Prioritising smart forward planning, a scaling up of public and private investment, faster policy development, and accelerate the planning, permitting and other administrative processes to deliver vital energy infrastructure and deliver on our decarbonisation targets.

Due to system-wide failures in energy planning and oversight, Ireland now faces significant electricity supply constraints this decade. We must ensure adequate investment in electricity infrastructure, including re-enforcing the all-island grid for greater capacity which can be achieved through pivotal projects like the North / South Interconnector. The Interconnector would secure the island's energy supply, meet legally mandated net-zero climate action goals and would go a long way towards protecting and strengthening the all-island Single Electricity Market, which has been integral to reinforcing energy security and integrating renewables. Complementary investments in electric grid capacity will also be required to make these measures a reality.

An integrated, long-term energy strategy to support the net-zero transition is warranted. Ireland's ambitious climate and environmental targets are not backed by the necessary policies, supports, and resources. The revised NPF should also include sufficient reference to renewable gases, in recognition of the significant role that renewable gases and the gas network will play in

transitioning Ireland's energy system to net-zero carbon in line with stated Government ambition.

Ireland lacks a clear vision for what a net-zero economy looks like. There remains great uncertainty regarding the role and interplay of different technologies/climate solutions and how the transition will be financed. Critically, the pace of infrastructure delivery remains far too slow. When setting out a clear vision and pathway for a net-zero economy, opportunities for growth and sustainable reindustrialisation should be identified. To develop the Irish net-zero manufacturing sector, accelerate business decarbonisation, demand response, and energy efficiency, a programme new supports and incentives including a multi-year competitive Carbon Contracts for Difference (CCfD) scheme to scale industrial decarbonisation should be explored.

To achieve our 2030 targets and 2050 ambition, Ireland will need large-scale carbon sequestration, through afforestation and sustainable land-use management. We must also ensure that there is adequate supply of zoned land for industrial use in our local and metropolitan areas to facilitate urban infill and brownfield development. Sufficient enterprise zoning for further business expansion on town peripheries should not be jeopardised.

National Strategic Outcome 9: Sustainable Management of Water and other Environmental Resources

Sustainable water management will be critical to achieving several stated aims in the revised NPF. It should set the strategic direction for protecting drinking water sources from future development. There needs to be a strong link between the revised NPF and the Water Framework Directive, drinking water source protection under the Drinking Water Directive and the catchment management approach generally throughout. The revised NPF should be developed in accordance with the River Basin Management Plan (RBMP), with a focus on the integration of water conservation efforts (e.g. rainwater harvesting) and efficient wastewater management activities (e.g. Nature Based Solutions) into development. The revised NPF needs to consider how emerging legislation will be catered for, such as the Recast Drinking Water Directive, the Urban Wastewater Treatment Directive and the Abstraction Legislation.

On the journey towards acceptable international benchmarks on water quality, the Greater Dublin Drainage Project (GDD) is a direct investment in the future of our public health. Ireland faces EU sanctions for continuing to discharge inadequately treated municipal sewage at multiple locations, including Dublin Bay. Poor water quality in our estuarine regions can be a serious problem not just for marine life, but also for leisure and tourism activity. Having been identified by Uisce Éireann in the National Water Resources Plan, they have included numerous provisions as part of the GDD to ensure it delivers the most environmentally, technically and economically beneficial solutions to meeting the populations long-term water service needs. The GDD project is entirely necessary to meet the Water Framework Directive (WFD) requirements and protect against future compliance risks with other EU Directives - alongside national regulations related to water quality and marine outfall.

Wastewater infrastructure is a key enabling infrastructure which has the ability to deliver on housing, economic and regional growth commitments. The GDD serves to provide long term sustainable wastewater drainage and treatment for the GDA through a new regional wastewater treatment facility and associated infrastructure. With projected wastewater increases of 50%+ over

the coming 30 years, adequate wastewater treatment must be in place to ensure sustainable development of the GDA and to ensure the safe return of wastewater to the natural environment.

We must consider the availability of water, the capacity of the environment to receive treated wastewater, and our infrastructure capacity, when planning development. The requirement for sufficient water & wastewater capacity to facilitate not just housing growth, but renewable energy assets and port development, should be considered. Noting this, to facilitate a sustainable plan led approach Planning Authorities must adhere to ambitions in revised NPF, without exceeding them, to ensure infrastructure providers can provide capacity in line with the NPF (as referenced in the Employment Lands Guidelines OPR Practice Note PN04).

We must ensure adequate funding for capital investment in utilities such as in water, wastewater and the completion of water projects of national importance (e.g. Water Supply Project Eastern and Midlands Region, as well as the Greater Dublin Drainage Project) in order to support sustainable and compact growth set out in the revised NPF. Embedding conservation efforts through leak reduction and public awareness campaigns and as seen in Uisce Éireann's Water Stewardship Programme will all work to this end.

Effective waste management

Under UN and EU rules, emissions are counted at the point of production. As such, the true carbon cost associated with our 'take, make and waste' linear economy goes underreported. The revised NPF must support the transition to a resource smart circular economy. This demands the widespread adoption of circular design and innovation principles and life cycle environmental impact assessments. The development of brownfield sites, regeneration projects, and the re-use of materials will all contribute to this objective. It will also require Government commitment to drive investment in the circular economy, maximising asset sharing and reuse opportunities, and integrating circular design principles, including through green and circular public procurement.

National Strategic Outcome 10: Access to Quality Childcare, Education and Health Services

There is a typo in the title for this National Strategic Outcome (i.e. it should be quality, not qualify).

Education

NSO 10 must underpin the role of further and higher education for enterprise and regional growth. It must seek to further strengthen the capacity of those institutions to deliver the talent necessary to drive economic and social development across the regions, while also delivering on nationally and international priorities.

Health

Public health services in Ireland are delivered across a network of 47 public hospitals, 22 voluntary hospitals and 19 private hospitals. Nearly one third of hospitals in Ireland are voluntary hospitals in partnership with the State. The voluntary sector nationally accounts for just under 30% of all inpatient care. Investment is needed in providing new and upgraded facilities and equipment across acute hospitals, palliative, mental health and social and older person's care. Additional resources are required to ensure adequate equipping and commissioning of such facilities. to provide improved standards of patient care, reduce waiting lists and deliver additional capacity into the healthcare system.

Increased investment is urgently required in mental health services. In addition, greater investment in resilience approaches will enable individuals to maintain their wellbeing and increase adaptability to future crises from a stronger foundation.

The revised NPF should support the deployment of digital, telehealth and other healthcare innovations delivering improved patient outcomes. Telehealth can play an important role in treating patients in non-hospital settings. Finally, innovation is essential to the healthcare sector.

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