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**An Roinn Tithíochta,  
Rialtais Áitiúil agus Oidhreachta**  
Department of Housing,  
Local Government and Heritage

**First Revision to the NPF  
Pre-Draft Consultation**

**Summary of Submissions received from the  
Planning Advisory Forum  
November 2023**

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Planning Advisory Forum	
Business & Industry	
Construction Industry Federation (CIF)	<p>CIF supports a plan led approach to achieve the transformation required at this critical juncture, however the review must be based on an objective evaluation of performance to date and the effectiveness of NPF policies having regard to the national strategic development requirements in S20C(2) of the Planning Act.</p> <p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• Under CAP 3 the major share of renewable energy will come from offshore renewable energy (ORE), however a diversified energy portfolio from multiple sources is required (onshore wind, solar, and gas will remain a contributor for energy security) and this will require development of a range of key infrastructure, offshore and onshore, to facilitate a secure energy.</li> <li>• There is an opportunity for balanced regional growth to be realised through renewable energy strategy and the CIF identifies potential locations of ORE projects and regional ports that are capable of providing landside support as hubs for ORE.</li> </ul> <p><b>Population and Demographics</b></p> <ul style="list-style-type: none"> <li>• The population projections in the NPF are incorrect, with Census 2022 figures higher than all four ERSI growth scenarios. The underestimation of population targets could lead to a housing shortfall in EMRA.</li> <li>• The implementation of the NPF has resulted in population ceilings in Development Plans that are restricting development land.</li> <li>• The Housing Need and Demand Assessment model must also be recalibrated to remove ceilings and incorporate unmet demand.</li> <li>• The first task of the review should be to align population growth and structural housing demand through a comprehensive assessment of the relevant factors: 1) obsolescence, estimated circa 109,000-180,000 houses over the next 17 years leaving a shortfall in the order of 400,000-600,000 homes in 2040; 2) headship rate, specifically ERSI's research showing a minor drop from 2.75 in 2016 to 2.74 in 2022 is a reflection of a high level of pent-up demand; 3) migration, CSO estimates for 2018-2023 identifies an average of 41,000 net migration movements pa requiring 14,600 additional units pa, and; 4) natural growth.</li> </ul> <p><b>Compact Growth</b></p> <ul style="list-style-type: none"> <li>• The review must include an analysis of the activation rate of brownfield and infill sites over the last 6 years, before introducing any change to the stated targets.</li> <li>• The impact of the new Built Urban Area (BUA) definition for monitoring compact development should be a key focus, and the review should also consider other internationally recognised methodologies such as 'Urban Agglomerations'.</li> <li>• The contribution that a Transport Orientated Development (TOD) can make in light of the government's €5bn investment in public transport between 2018 and 2027.</li> </ul>

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	<p><b>Regional Growth and Ambition</b></p> <ul style="list-style-type: none"> <li>• Promote balanced investment in transport infrastructure, including public transport, rail, active travel and interconnectivity between our cities, ports and transport hubs with roads.</li> <li>• Growth of the regions has to be driven by proactive measures – infrastructure investment, tax benefits for employment location, and transport initiatives. Alignment between the NPF, NDP, Housing for All, and utilities will be critical.</li> </ul>
<p><b>IBEC</b></p>	<p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• NPF needs to be climate proofed.</li> <li>• The infrastructure needed to diversify our energy supply will need prioritisation in the revised NPF, from offshore wind to current gas network upgrades.</li> <li>• Assessments of carbon impacts should consider the direct emission associated with the project’s construction/development, life cycle/operation, and knock on impacts locally, upstream, and downstream. Through sustainable design principles, emissions sources can be avoided before they’re created. Energy parks and the careful colocation of energy demand and supply offers great potential to address emission at an early stage.</li> <li>• The NPF must enforce sustainable land-use management to enable large-scale carbon sequestration through afforestation.</li> </ul> <p><b>Population and Demographics</b></p> <ul style="list-style-type: none"> <li>• Prioritise the population and demographics in the NPF review following the release of Census 2022 data.</li> <li>• Provision should be made for a consultation process to take place on the ESRI demographic analysis.</li> <li>• 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.</li> <li>• The revised NPF must ensure that the Housing Needs Demand Assessment (HNDA) tool considers changing household size.</li> </ul> <p><b>Regional Growth and Ambition</b></p> <ul style="list-style-type: none"> <li>• Targets for balanced regional development and compact growth must be led by, and informed by, infrastructure development.</li> <li>• Key growth-enabling infrastructure projects identified in each RSES, including the MASPs, which support the sustainable development of our regions, metropolitan areas, regional growth centres, and ‘key towns’ should be included in the revised NPF.</li> <li>• Regional growth targets should address enterprise and employment, alongside population and housing requirements.</li> </ul> <p><b>Compact Growth</b></p> <ul style="list-style-type: none"> <li>• The revised NPF must prioritise where possible the development of brownfield sites, regeneration projects, and the re-use of materials.</li> <li>• Needs to be a renewed alignment of land use with transport provision to enable successful Transport Orientated Development and sustainable mobility options</li> </ul>

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	<ul style="list-style-type: none"> <li>• Compact growth targets should not only refer to housing but also take into account places of employment to support communities.</li> </ul> <p><b>Digitalisation</b></p> <ul style="list-style-type: none"> <li>• 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. Digitalisation can also enable the development of smart cities and smart regions, as well as enhanced public services.</li> </ul> <p><b>Investment and Prioritisation</b></p> <ul style="list-style-type: none"> <li>• The National Training Fund is available to use to address skills gaps in the economy.</li> <li>• Provide for a ‘city centre first’ policy alongside Town Centres First. In addition, the revised NPF must seek to the getting MASP governance and implementation structures right.</li> <li>• The performance of the NPF over its lifetime must be closely monitored, with a specific focus on local and regional performance.</li> <li>• The NDP must be reviewed following the revision of the NPF to ensure full alignment between the two and the capacity to deliver.</li> <li>• It is important that government policies and strategies, where applicable, are consistent with the NPF and vice versa. A statement should be contained in the revised NPF detailing how it is to interact with emerging Government policies between now and the next six-year review.</li> <li>• Include the all-island dimension to joint-spatial planning in the revised NPF. The revised NPF must support all-island initiatives in critical areas such as climate change and the decarbonisation agenda, energy, education and skills, R&amp;D, healthcare, connectivity, joint spatial planning, and infrastructure provision. These include the North-West City Region and the Dublin-Belfast Economic Corridor.</li> </ul>
<p><b>Irish Institutional Property Group (IIP)</b></p>	<p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• Careful consideration and identification of possible consequences needs to be given to enhanced biodiversity and the measures and policies that the NPF revision should prioritise.</li> </ul> <p><b>Population and Demographics</b></p> <ul style="list-style-type: none"> <li>• ESRI's conclusions, once available, should undergo stakeholder consultation.</li> <li>• How effective is the HNDA toolkit?</li> <li>• Additional headroom should be incorporated into the targets to account for headship ratios converging toward the EU norm of 2.2 members per household. Additionally, addressing obsolescence alone necessitates the creation of 8,000 new housing units per year.</li> </ul> <p><b>Regional Growth and Ambition</b></p> <ul style="list-style-type: none"> <li>• Balanced regional growth is important. However, the move to balanced regional growth may not happen as quick as had hoped and therefore IIP recommends that inflexible spatial housing limits are avoided and some headroom for the Greater Dublin Area to grow is built in.</li> </ul>

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	<p><b>Compact Growth</b></p> <ul style="list-style-type: none"> <li>• In the short term, to meet housing demand, all available serviced lands near cities and towns needs to be focused on and not just brownfield.</li> </ul>
<p><b>Property Industry Ireland (PII)</b></p>	<p>Viability assessments should be undertaken in advance of any zoning decisions taken by LAs.</p> <p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• The NPF should ensure that a critical mass is achieved in locations where significant investment has taken place in social and physical infrastructure rather than requiring substantial additional investment in locations that are presently underserved. This means that a balance must be struck between promoting regional growth and allowing for growth where this infrastructure is located, currently in the Greater Dublin Area (GDA).</li> <li>• The carbon footprint associated with brownfield development can be substantial therefore further consideration needs to be given to this.</li> </ul> <p><b>Population and Demographics</b></p> <ul style="list-style-type: none"> <li>• It is important that the ESRI demographic forecasts and the assumptions on which these forecasts are based are sufficiently consulted upon and scrutinised. PII recommend that when available, the scenarios and models developed should be sent to stakeholders for comment and feedback.</li> <li>• PII does not share the view that current population is broadly in line with that projected in the NPF. The population forecasts are based on 2016 data so only 4 years into the NPF they were 50,000 people off. Based on current household size this is the equivalent of 18,100 homes.</li> <li>• Use of the HNDA tool by LAs has led to an underestimation of existing and future population needs. There is therefore a need for far greater 'headroom' in zoning of land for housing, to provide for at least 12 years supply.</li> <li>• PII welcome the concept of a 'convergence' approach to meeting the 2040 ambition of balanced regional growth. We believe that allowing certain locations, as identified in the issues paper, to grow at a higher rate in the near term in light of current demand is a pragmatic approach. It recognises that the policy of more balanced regional growth cannot be immediately realised</li> </ul> <p><b>Regional Growth and Ambition</b></p> <ul style="list-style-type: none"> <li>• It is critical that the redistributive objectives are promoted by positive incentives and that restrictions or controls on housing provision in areas of strong demand and high housing need are avoided.</li> <li>• There is a fundamental need to stop using spatial housing limits as a means to drive balanced regional growth. Growth of the regions has to be driven by pro-active measures – infrastructure investment, tax benefits for employment location, transport initiatives etc.</li> <li>• The NPF Review should consider the inclusion of transitional measures to deal with the housing crisis whereby LAs are afforded discretion to permit development on lands currently zoned, including within recently expired Local Area Plans (LAP), where the Development Plans do not have zoning Plans.</li> <li>• Investment in regional infrastructural development is essential to attract people to move to the regions first. In the absence of any evidence that job growth in the</li> </ul>

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	<p>regions is outstripping GDA then it is not possible to redistribute population unless for remote working, which could result in some unsustainable commuting patterns.</p> <ul style="list-style-type: none"> <li>• A reallocation of capital investment is required, directing more resources toward the regions outside of Dublin that are primed for growth.</li> </ul> <p><b>Compact Growth</b></p> <ul style="list-style-type: none"> <li>• The recommendation of the Expert Review Group that the current NPF objectives of 30% / 50% of projected growth on brownfield lands be increased is of serious concern. A more balanced approach should be pursued which allows for growth in other areas as well, i.e. areas with accessibility to existing or planned public transport etc., which are not necessarily brownfield.</li> <li>• Targeted initiatives will be needed at both national and local level to address the viability challenges for compact growth as each site’s problems can be unique.</li> <li>• The current definition of compact growth, based on CSO settlement boundaries, should be retained.</li> <li>• The RZLT measure will add to the cost of housing.</li> </ul> <p><b>Investment and Prioritisation</b></p> <ul style="list-style-type: none"> <li>• There is an urgent need to place greater emphasis on expediting the delivery of critical infrastructure that supports and facilitates development, including Uisce Éireann infrastructure, roads, rapid bus corridors, light rail systems, etc.</li> <li>• PII agree with the expert group's recommendation to establish an annual performance assessment mechanism for the NPF.</li> </ul>
<p><b>Cross-border</b></p>	
<p><b>Department for Infrastructure – Northern Ireland (DFI-NI)</b></p>	<p><b>General Comments</b></p> <ul style="list-style-type: none"> <li>• Many of the issues highlighted by the Issues Paper are planning challenges shared by both administrations.</li> <li>• The Department is keen to promote specific cross border opportunities such as the Dublin-Belfast Economic Corridor, the potential to sustainably develop the critical mass of the Newry-Dundalk area, and the on-going efforts of the North West Strategic Growth Partnership.</li> <li>• The Department is involved in the All-Island Strategic Rail Review, looking at how to connect communities and businesses across Ireland and deliver cleaner rail travel.</li> </ul>
<p><b>International Centre for Local and Regional Development (ICLRD)</b></p>	<p>Lack of reference to Northern Ireland and an All Island approach and reference to All-Island data. It is also of concern that no reference has been made to the significance of trans-frontier population and economic activity on settlement patterns, movement of workforce and/or business growth.</p> <p>Recommendation to consult and discuss the NPF revision with colleagues in Northern Ireland.</p> <p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• Achieving our climate targets requires policy-alignment on an island of Ireland basis.</li> </ul> <p><b>Regional Ambition</b></p> <ul style="list-style-type: none"> <li>• The general principle of ‘effective regional development’ within the Issues Paper is to be welcomed. This requires a recognition of the unique spatial geographies of the</li> </ul>

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	<p>various regions across the State, and the requirement for a bespoke approach to regional challenges and opportunities across Ireland. In planning for, and investing in, effective regional development, there is a need to focus on the functionality of regions.</p> <ul style="list-style-type: none"> <li>• In terms of ‘regional growth drivers’ cross border gateways should be acknowledged such as the North West City Region, Sligo/Enniskillen and Newry/Dundalk-Drogheda.</li> <li>• The North West City region should be further developed and supported.</li> </ul> <p><b>Compact Growth</b></p> <ul style="list-style-type: none"> <li>• The commitment to compact growth is welcomed, noting that the success of this policy is dependent on strong connectivity, enabled by physical and digital/technological infrastructures which offer choice and flexibility within the employment space, the offer of a range of housing choices to meet demand and requirements, and access to a broad range of services which contribute to quality of life factors and overall well-being.</li> </ul> <p><b>Investment and Prioritisation</b></p> <ul style="list-style-type: none"> <li>• There is a growing need for an all-island data portal, covering demographics, housing, employment, retail, marine, air quality, etc.</li> </ul>
<p><b>InterTrade Ireland</b></p>	<p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• Consider alignment with the Department for Enterprise, Trade, and Employment White Paper on Enterprise (2022) commitment to develop a National Clustering Programme by 2025. Our experience of running successful all-island and cross-border cluster initiatives such as our Synergy programme has demonstrated the vast potential of clustering to drive economic growth, to integrate sustainable and digital working practices, to deliver balanced regional development, to embed innovative SMEs in the enterprise space, and to realise the benefits of collaboration.</li> <li>• Consider how the NPF revision contributes to the objectives of the Circular Economy Act.</li> <li>• Due to the all-island energy market, geographical challenges, and economies of scale, consideration should be given to further cross-border work in renewable energy that develops the ambitions of the NPF, perhaps in alignment with the Department of the Taoiseach’s Shared Island approach. The Bioeconomy Demonstration Initiative Scheme, in which InterTrade Ireland plays a coordinating role, could be monitored to provide examples of sustainable, low carbon innovation.</li> </ul> <p><b>Regional Growth and Ambition</b></p> <ul style="list-style-type: none"> <li>• Future growth targets might also consider the benefits of regional development from a cross-border perspective (e.g. housing and infrastructure in the border counties, or how cross-border clusters could attract FDI) and how these might be quantified.</li> <li>• The North-South Implementation Bodies could play an advisory role in encouraging balanced cross-border development.</li> </ul> <p><b>Digitalisation</b></p> <ul style="list-style-type: none"> <li>• The NPF could consider the success of existing digital economy clusters and networks and build on their strengths. For instance, Cyber Ireland and the Fintech</li> </ul>

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	<p>Corridor demonstrate how collaboration can drive innovation and productivity in high-value industries. Consideration could also be given to cross-border and all-island approaches to the digital economy given Northern Ireland’s established position in key areas such as cybersecurity.</p>
<p><b>Environmental Agencies</b></p>	
<p><b>An Taisce</b></p>	<p>Queries the status of the Issus Paper and consultation process and lack of detail on membership of the Cross Departmental Steering Group.</p> <p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• Need to ensure ongoing monitoring and reporting of environmental impacts be carried out over the lifetime of the plan and remedial actions taken where unforeseen negative impacts are identified in line with provisions of Article 10 of the SEA Directive. This should be based on quantitative audited data.</li> <li>• The SEA monitoring data and reports should be provided to guide the review of NPF.</li> <li>• The SEA will need to be updated to define adequate objectives, targets and indicators to meet legal obligations, noting Recommendation 9 of the Expert Review Group’s report to establish a dedicated unit to monitor implementation annually.</li> <li>• Need to consider the implications of the ongoing National Land Use Review, including Phase 2, which has just begun and will focus on the development of policies, measures and actions on foot of Phase 1 evidence.</li> <li>• Need for increased urgency to meet emissions reductions targets in the Climate Act, given the current trajectory to end of 2025 means a significant overshoot and proportionately reduced Sectoral Emission Ceilings in the 2026-2030 carbon budget. An Taisce’s analysis shows that Ireland is further off track than the EPA report.</li> <li>• The review should resolve contradictory objectives in the NPF for the development of carbon and energy-intensive infrastructures, and apply Just Transition principles.</li> <li>• Addressing biodiversity loss needs to be a key priority as many of the pressures facing protected habitats and species fall under planning and related regulations including construction, extraction of resources, energy, transport, and infrastructure development. Specific and targeted objectives and measures need to be included, including the relevant recommendations of the Citizens’ Assembly.</li> <li>• The development of a sustainable and effective offshore energy regime is a priority. Protection and enhancement of marine biodiversity needs to be a key factor in marine planning policy and decisions. The NPF review needs to consider how to better integrate ecosystem restoration into planning policy and forward planning.</li> </ul> <p><b>Compact Growth</b></p> <ul style="list-style-type: none"> <li>• An Taisce supports the emphasis on compact growth but highlights the gap between realising compact settlements and balanced regional development on the ground.</li> <li>• The NPF should incorporate and update the seven location test standards for new housing outlined in the National Spatial Strategy 2002 and include more target-based objectives particularly in relation to transport and climate mitigation.</li> </ul> <p><b>Digitalisation</b></p> <ul style="list-style-type: none"> <li>• NPF should provide for enhanced community infrastructure to counteract the potential isolation and marginalisation of various groups as a result of digitisation.</li> </ul>



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	<ul style="list-style-type: none"> <li>• A review of data centre energy demand is needed to inform a new national policy on the level of data centre development that can be accommodated with a moratorium put in place on future development and connections in the interim.</li> </ul> <p><b>Investment</b></p> <ul style="list-style-type: none"> <li>• Public expenditure decisions should be made in accordance with obligations on public bodies under S15 of the Climate Act (see An Taisce submission to NDP review)</li> </ul>
<b>Heritage Council</b>	<p>In terms of well-being, it should be highlighted that the use of heritage assets is a major contribution to the wellbeing of society.</p> <p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• There is a need to explore how landscape can be managed to retain its character in the face of varying land needs.</li> <li>• Provision needs to be made in relation to foreshores and the provision of off-shore renewable energy and bringing it on land – joined up approach required.</li> <li>• The new EPA landcover mapping should be highlighted as a useful tool.</li> <li>• Further reference required to Sustainable Development Goals.</li> <li>• Explore the potential of nature based solutions.</li> </ul> <p><b>Compact Growth</b></p> <ul style="list-style-type: none"> <li>• Compact growth and the consolidation of rural towns and villages must involve the reuse of existing, frequently vacant or under-used, structures. However, we contend that alongside the provision of housing, there should be a goal to create high-quality spaces with opportunities to access natural and cultural heritage which involves the sensitive re-use of historic buildings.</li> </ul>
<b>Irish Environmental Network (IEN)</b>	<p>The role of the Planning Advisory Forum in respect of the Issues Paper remains unclear.</p> <p><b>General issues raised</b></p> <ul style="list-style-type: none"> <li>• The issues paper fails to provide any meaningful current situation analysis in terms of Ireland today.</li> <li>• Need to prioritise key indicators including water and air quality, biodiversity, economics, societal welfare and wellbeing. The NPF should be delivering a transformational programme of change.</li> <li>• Failure to manage the transformation needed to be able to properly realise the potential from offshore renewable energy.</li> <li>• Concern that the scope of the NPF revision will fall far short of what is required.</li> <li>• Failure to identify and consider constraints, be it financial, water and waste water in terms of the vision of growth proposed.</li> <li>• Importance of monitoring.</li> <li>• Evaluation of data is key - For example in the context of the increasing reality of climate change and extreme weather events including flooding – basic questions should be asked and answered objectively and based on science and fact about the centres for expansion and consolidation, rather than on what is politically expedient.</li> <li>• The questions presented and policy focuses are overly limited.</li> <li>• There is an inadequate approach in the issues paper to meaningfully engage in the factors which have led to the failure of the compact growth strategy.</li> </ul>

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	<ul style="list-style-type: none"> <li>• A number of areas are inadequately addressed such as the biodiversity crises, water and urban waste water directives.</li> <li>• Consideration needs to be given for the wider implications of infill development policies in terms of practical implications for quality of life, compromise of existing even informal green spaces, and air quality and to ensure that policies around transport capacity and other service infrastructure are properly adhered to</li> <li>• No recognition of the wider geo-political instabilities, particularly for climate migrants.</li> <li>• Failure to table and discuss a responsible de-growth agenda, and just transition and what that means for the NPF.</li> <li>• Unacceptable approach taken with the expert review group and lack of transparency.</li> </ul>
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**Infrastructure**

<b>Eirgrid</b>	<p><b>General comment</b></p> <ul style="list-style-type: none"> <li>• The National transmission grid operates on an all-island basis, coordinated by SEMO the single electricity market operator. While the NPF comprises a strategy for Ireland, it is of imperative importance that good reference is made to its all-island context, including in terms of regional development, renewable energy generation and electricity infrastructure connection and interconnection.</li> </ul> <p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• There needs to be a clear acknowledgement that while the NPF itself has a certain time-bound existence, its policies and objectives are targeted on a longer-term vision- out to 2050 and even beyond, which is of relevance to strategic infrastructure planning and development, including grid infrastructure development, which always takes a long-term lifetime scenario.</li> <li>• Renewable generation cannot be considered in isolation from its means of connection to both the national electricity transmission and lower-voltage distribution grids. The Draft Grid Implementation Plan 2023-2028 is currently the subject of public consultation, and is planned to be adopted in early 2024.</li> <li>• Opportunity for the NPF to take a greater role as a strategic implementer and enabler of National and European legislation such as RePowerEU, the Nature Restoration Law etc.</li> <li>• Cross-functional planning, workshops, and collaboration approaches could be promoted in the revision of the NPF to allow for strategic development.</li> </ul> <p><b>Population and Demographics</b></p> <ul style="list-style-type: none"> <li>• There is the opportunity for the revision to consider whether it can put more focus on measures to achieve the 50:50 strategy, by means of enhanced infrastructure provisions in the Southern and North-Western region. From an energy infrastructure perspective this has the benefit of less infrastructure required to carry power from where it is generated to where it may be consumed. The regional development of MASP areas, the regional cities as hubs, and regions in general has been considered in EirGrid’s <i>Shaping our Electricity Future</i>”.</li> </ul> <p><b>Compact Growth</b></p> <ul style="list-style-type: none"> <li>• The focus of compact growth and its tie-in with the Climate Action Plans, and to the achievement of balanced regional development is to be welcomed. This will</li> </ul>
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	<p>allow EirGrid to plan its network requirement with clear reliance on strong policy context.</p> <p><b>Digitalisation</b></p> <ul style="list-style-type: none"> <li>• The focus on digitalisation is a key underpin of balanced regional development, and change in social and cultural ways of living and working. This emphasises the importance of focus on ensuring provision of adequate communications and electricity corridors. EirGrid recommends strong policies in the NPF that corridors are identified and protected in Regional and Local Development Plans.</li> </ul> <p><b>Investment and Prioritisation</b></p> <ul style="list-style-type: none"> <li>• EirGrid welcomes the recommendations of the Expert Group relating to a Cross-Government approach to decision-making and implementation (Recommendations 10 and 11).</li> <li>• It is our view that the approach to the identification and prioritisation of key enabling infrastructure required to deliver on NPF objectives should be reviewed as part of the revision.</li> </ul>
<p><b>ESB Networks</b></p>	<p><b>General observations</b></p> <p>Supportive in general of the Issues Paper. Key recommendations below:</p> <ul style="list-style-type: none"> <li>• ESB Networks is fully supportive of the strategic aims of the National Planning Framework in particular the shared ambition of a low carbon society. ESB Network is keen to ensure the requirement for electrical infrastructure necessary to connect renewable generation to homes, farms and businesses is given priority status within the development plans and planning system.</li> <li>• Electrification of society giving rise to the anticipated increased customer loads associated with the electrification of transport and heat, potentially increased city/urban population density will put pressure on existing electricity infrastructure. Additional electricity assets such as lines, cables, substations will be required and these should be integrated into the regional plans at inception.</li> <li>• Investment in electrical infrastructure should be enhanced where this aligns with the objectives of the National Planning Framework (NPF) and the Regional Spatial Economic Strategies (RSES) – particularly as many of our projects have a regional dimension.</li> <li>• In a national infrastructure context ESB Networks would like to see national route corridors for future underground cables and overhead lines to support the regional spatial growth strategies.</li> </ul>
<p><b>National Transport Authority (NTA)</b></p>	<p>The NTA considers that in the context of carbon emission reductions and the requirement to create sustainable communities, there is no room to deviate from the principles of the following themes, namely; regional balance, city and regional growth drivers, and compact urban growth. They should be further strengthened and a mechanism to ensure implementation should be explored.</p> <p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• The NTA considers that the review of the NPF should ensure that the actions required by the Climate Action Plan are fully integrated into the revised NPF and</li> </ul>

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that the NPF enables targeted and focused measures to be put in place to meet the targets set out in the Climate Action Plan.

- The NTA recommends that the NPF supports the development of Metropolitan Area Transport Strategies, Local Transport Plans as well as the development of Regional Transport Strategies which would be developed at Assembly level as part of the development of the Regional Spatial and Economic Strategies.

### **Population and Demographics**

- The NTA recommends that the revised NPF recognises the extent of population growth and the specific characteristics of this growth, such as an ageing population, while also recognising, that in light of the climate crisis and the requirement to meet carbon emission reduction targets; there is no scope to diverge from a policy of creating sustainable and compact growth.

### **Regional Growth and Ambition**

- The NTA considers that the NPF principles in relation to the location of services, commercial development and employment intensive land uses in particular, should include a presumption that walking, cycling and public transport networks are available. The NPF should identify the types of developments that are appropriate to various location types and set out that all such development, regardless of their spatial requirements, should operate on the basis of catering for the majority of trips by sustainable transport.
- The NTA recommends that the NPF focuses on the promotion of mixed-use neighbourhoods, whereby services are accessible by sustainable modes, thus reducing the reliance on the private car and enabling compact growth.

### **Compact Growth**

- The NTA recommends that more definitive and stringent targets for compact growth are included in the NPF to ensure that future housing is provided where support for the provision and use of public transport, walking and cycling can be clearly demonstrated. In this regard, the development of the main metropolitan areas, key towns and other large town should be guided by the preparation of Metropolitan Area Transport Strategies and Local Transport Plans, respectively.
- In the context of small towns, villages and their associated rural hinterlands, the NTA recommends that the focus should be on the accommodation of housing demand into the urban settlements, with appropriate controls being applied to rural housing. This would support the basis for improved public transport connectivity to and between smaller settlements, improving the potential for service provision at the local level and reducing car dependency.
- The NTA would welcome a focus on creating a national conversation which conveys the importance and requirement for transformational change in the built environment and transport sectors and which explores the mechanisms (e.g. infrastructure, services, demand management and behaviour change) that will be required to bring about that change.

### **Digitalisation**

- The NTA recommends that while the effects of remote working are still emerging, the NPF should focus on ensuring that the demand for urban generated housing in the regions does not undermine the requirement to create compact settlements.

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	<p>Flexibility in our working arrangements, and associated reduced levels of work-based commuting, should not be used to justify further dispersal of urban-generated housing into rural areas and should not be allowed to contribute to increased car dependency for trips for non-work purposes, such as trips to school, retail and for leisure purposes.</p> <p><b>Investment and Prioritisation</b></p> <ul style="list-style-type: none"> <li>• The NTA recommends that the NPF recognises the requirement for funded plan and on-going multi-annual investment in transport services and operations.</li> <li>• The NPF should therefore provide a clear focus on supporting the NTA in its remit to deliver its current and emerging transport investment programmes, developed within the existing legislative and policy framework.</li> <li>• The NTA supports a robust approach to evaluation and monitoring which is data driven and will assist with the better integration of land-use and transport planning.</li> </ul>
<p><b>Transport Infrastructure Ireland (TII)</b></p>	<p>Welcomes the opportunity to continue to engage to the revision of the NPF. However, the current National Policy Objectives offer very limited support on how to achieve the transport outcomes of the National Strategic Outcomes of the NPF. TII considers this needs to be examined and addressed by this current review.</p> <p>The most directly relevant National Strategic Outcomes relevant to TII’s activities are as follows; NSO1 Compact Growth; NSO2 Enhanced Regional Accessibility; NSO4 Sustainability Mobility; NSO6 High-Quality International Connectivity and NSO8 Transition to a Climate-Neutral and Climate-Resilient Society.</p> <p>The revised NPF needs to reflect the following; Department of Transport’s National Investment Framework for Transport in Ireland (NIFTI, December 2021). National Sustainable Mobility, Climate Action Plan, and the DoT’s National Sustainable Mobility, TII’s National Road 2040 Report National Roads 2040 2018-04-24 (tii.ie) and the learnings from the Metropolitan Transport Strategies . Particular attention should be paid to the integration of transport and land use planning through the implementation of Metropolitan Transport Strategies and also Key town local transport plans within rather than beside the statutory planning framework.</p> <p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• Facilitating the transition of the passenger car fleet to electricity and providing additional on-route charging infrastructure.</li> <li>• Support sustainable mobility options and demand management.</li> <li>• Project Better Road User Charging Evaluation.</li> <li>• Pilot initiatives for low emitting technologies in the transport sector.</li> <li>• Investment in the road network to be more resilient to the effects of climate change.</li> </ul> <p><b>Regional Growth and Ambition</b></p> <ul style="list-style-type: none"> <li>• Metropolitan Transport Strategies should be included within the statutory planning framework.</li> <li>• TII recognises that transport connections between Cork, Limerick, Galway, and Waterford need to be improved.</li> <li>• TII has interpreted the Regional Accessibility NSO priority as being between the 5 City Regions and the 5 identified urban centres. TII National Road 2040 strategy and indeed DoT’s has interpreted the target of 90kph inter-urban speed as between the 5 cities and 5 urban centres of Letterkenny, Athlone, Sligo, Dundalk, and Drogheda.</li> </ul>

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- Separate from the need for regional connectivity it needs to be recognised that Ireland's economy is heavily dependent on the efficient movement of goods, both domestically as well as into and out of the country and is therefore dependent on efficient domestic and international transport networks. Freight dependent industries need high-quality transport connections to ensure certainty of arrival of incoming goods and outward shipping of products. Producers and retailers need efficient distribution systems for timely access to their markets and customers. Currently, the vast majority of internal trade freight in Ireland is carried on the road network, in a variety of vehicles, from Heavy Goods Vehicles (HGVs) to smaller vans TII estimates that in the region of 80-90 percent of all freight transport occurs on National Road.

### **Compact Growth**

- Agree with the policy of compact growth, particularly as a means to reduce congestion. Area Based Transport Assessment is useful in the preparation of local area plans, planning schemes and masterplans.
- TII is progressing large public transport projects in the regional cities such as MetroLink, Luas Finglas and Luas Cork. TII is facilitating the reallocation of road space to bus lanes in corridor upgrade projects on key inter-urban approaches to Dublin such as the N3, N4 and N11. TII is also planning active travel improvements for orbital trips in Dublin as an alternative to certain trips on the M50. TII views the demand for orbital trips in the cities as an emerging pressure point on transport networks both in peak and off-peak times.

### **Investment and Prioritisation**

- TII reiterates and supports Expert Review Group Recommendation no. 8 "The revision of the NPF should consider a systematic evaluation of the National Strategic Outcomes and the National Policy Objectives to ensure that outcomes and objectives are clear and support consistent implementation." In this regard, TII reiterates that outcomes and objectives should include clear commitments to maintaining the resilience of national assets, integration of land use and transport, regional and international connectivity.
- The NPF under NSO6 recognises that National Roads and Metrolink are important elements in ensuring high quality international connectivity to ports and airports. High quality international connectivity is particularly important for business and freight travel. Strengthening access routes to Ireland's ports and airports through investment in upgrading and enhancing the road and rail transport network remains a government priority in the NDP.
- Continued support for the TEN-T policy, based on Regulation (EU) No 1315/2013. Two National Road schemes will complete the Core network improve access to the Tier 1 ports of Ringaskiddy and Shannon-Foynes. The construction of the national road links will complete the core Trans European Transport Network (TEN- T) Core Road network in Ireland and are to be completed by 2030 in line with EU TEN-T regulations.
- In TII's experience there is a critical need to co-ordinate the planning and delivery systems associated with transport, housing, health, water, waste, energy generating projects and grid infrastructure development, including identifying a co-ordinating mechanism to ensure proposals brought forward by State bodies, statutory undertakers and the private sector are integrated. There is an absence of a

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	<p>coordinated and integrated framework approach to projects between sectors which has led to delays and risks to implementation especially when seeking planning consent.</p> <p>TII would welcome the revision of the NPF to consider:</p> <ul style="list-style-type: none"> <li>• Naming the principles for identifying priority locations for the deployment of infrastructure at a strategic scale across the country.</li> <li>• Undertaking a systematic evaluation of the National Strategic Outcomes and the National Policy Objectives to ensure that outcomes and objectives are clear and support consistent implementation especially in relation to maintaining the resilience of national assets, integration of land use and transport, regional and international connectivity.</li> <li>• Ensure alignment of stakeholders (all key National, Regional and Local, including State bodies and State-owned enterprises) to support the cross sectoral implementation of the NPF</li> <li>• Ensure alignment between the NPF and National, Regional and Local Plans, including County Development Plans and Metropolitan Transport Strategies. This should also include the review of alignment of policies issued from all government departments.</li> <li>• The establishment of a dedicated unit mandated with appropriate powers to monitor and coordinate implementation of the NPF between government departments, local authorities and agencies. The benefits of establishing such cross-departmental implementation group at the centre of government could systematically prioritise and co-ordinate decisions in relation to all key infrastructure decisions, including the NDP projects and programmes.</li> <li>• Multi-annual funding budgets need to be considered.</li> </ul>
<p><b>Uisce Éireann (UÉ)</b></p>	<p>Supportive in general and welcomes opportunity to make a submission.</p> <p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• National Guidance is needed on the enhancement of biodiversity and a legislative basis to address the biodiversity emergency is required to ensure consistency across sectors. There needs to be a recognition that not all projects will be able to achieve No Net Loss or Net Gain in the particular area that is being developed. For instance, building in a highly populated area with land constraints.</li> <li>• Water demand management (by households and businesses) needs to be prioritised at every level within the planning system with an overarching goal included as a National Planning Objective.</li> <li>• Retro fit of Nature Based Solutions to cater for urban run-off in existing urban environments, needs to be a priority measure to progress through a cross Departmental initiative. Integrated Drainage Plans will be required between UÉ and Local Authorities initially to focus on the Cities and then progressing to the larger towns prioritised on a risk basis.</li> <li>• Environmental and source capacity needs to be a key consideration when identifying growth areas. The capacity of the environment and the natural resource/source to achieve the ambitions as outlined / proposed. As a country we must consider the ability of the natural resource to cater for our longer term needs.</li> <li>• Agree that sustainable development needs to be considered across multiple sectors.</li> <li>• The development of water use efficiency in homes and businesses should be highlighted as an objective in the revised NPF. Having a greater efficiency of use of</li> </ul>



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potable water will reduce our climate targets as well as protect the natural resource in some areas, which may be vulnerable.

- Mapping the key ingredients for renewable energy whilst also taking into account the impacts on the natural asset base could prioritise locations for development.
- Need to ensure that the best available use of the existing infrastructure is made to ensure that we are not oversizing assets due to over ambitious growth projections, for areas that may not be realised.

### **Population and Demographics**

- Population forecasts at a local level are currently unaligned with housing targets leading to significant confusion associated with demand ambitions into the future. A new methodology for identifying the housing target needs to be developed. Beneficial if the methodology and requirements to account for both population and housing numbers was aligned and clarified in the revised NPF.
- The desire for increased ambition for compact development (within existing footprints) is welcomed given that this approach maximises the use of existing water and wastewater services infrastructure. However, greater clarity on the likely industrial and commercial development requirements in different locations would be very useful in terms of longer-term forecasting to ensure that water and wastewater needs in the medium to long term are appropriately planned for. Greater certainty associated with the location of economic / industrial growth will assist in meeting the demands of the residential population ambitions and targets.
- There needs to be a discussion about the need for creating a built environment that caters for overall changing needs of communities, and the important contribution that national spatial planning can make to better manage these demographic changes.

### **Regional Growth and Ambition**

- In determining the split of population targets between the regions, it is imperative that we consider the Environment and Natural resources, while infrastructure can be upgraded to cater for growth projections, can the natural environment cater for this growth and infrastructure. Natural resources / Water Services needs to be elevated to the same plane as Transport and Climate and stitched into the fabric of national planning policy e.g. Having regard for the National Water Resources Plan within the planning and land use context.
- It is imperative that we develop a policy direction and plan for how we wish to grow the regions from an economic perspective. A detailed plan of the economic growth projections for the regions from Enterprise Ireland, IBEC and the IDA will help in planning a strategy for the targets proposed.

### **Compact Growth**

- UE acknowledges the emphasis on compact growth and the continuing imperative of Housing delivery. Neither can happen without key enabling water services infrastructure. In Dublin and the Midlands and Eastern regions, for example, we note that 54.7% of State growth has occurred as per Census 2022. To cater for this growth whilst protecting the environment it is imperative that critical infrastructure projects such as the Greater Dublin Drainage project and the Water Supply Project Eastern and Midlands Region (both called out in the NDP) are prioritised by Development Plans and as they travel through the consent process.



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	<ul style="list-style-type: none"> <li>• The current compact growth targets could be strengthened, thus reducing the overall costs associated with the provision of and development of multiples of water services infrastructure to cater for greenfield growth (for e.g. Pump Stations, etc.).</li> <li>• Targets need to be able to be monitored and reported on.</li> </ul> <p><b>Digitalisation</b></p> <ul style="list-style-type: none"> <li>• Digitalisation and mapping of the natural resources available utilising key publications, available data and studies completed to inform where we can facilitate growth. Utilising the best available technology to support the identification of the most appropriate areas to grow as well as utilising technology to support the generation of accurate growth ambitions.</li> <li>• The proposal of clustering SME’s to encourage the formation and strengthening of national cluster organisations, leveraging the benefits of proximity and co-location to boost productivity. This can be supported by appropriate scale governance and legislative frameworks to foster the development of demand management measures in businesses and schools. This should mirror existing efforts related to energy use and incorporate but not be limited to reduction in demand, water reuse, location of industry in suitable locals to facilitate process water reuse from one industry to another.</li> </ul> <p><b>Investment and Prioritisation</b></p> <ul style="list-style-type: none"> <li>• Delivery of critical infrastructure (water services, energy and transport), in the common good, should be stitched into the fabric of planning policy and legislation with consenting regimes given to critical infrastructure delivery.</li> <li>• Consideration should be given to establishing a cross-sectoral multi-disciplinary NPF taskforce, with sub-groups to feed into themes. Departmental cross-functional ways of working should be established within each department, with a single point of contact identified for NPF themes. The establishment of a state agency infrastructure group to ensure information re vulnerability of the natural resources, critical water services, energy and transport is mapped at a national level, up to date and potential opportunities / barriers are identified would be beneficial.</li> <li>• UE agrees that consideration should be given to the different investment timelines so that appropriate lead times for water and wastewater infrastructure can be incorporated into infrastructure planning.</li> <li>• We would welcome the establishment of a lead authority to co-ordinate the consenting processes for public infrastructure, carrying out one Environmental Impact Assessment (EIA) and Appropriate Assessment (AA), co-ordinating joint oral hearings if necessary, and ensuring concurrent and consistent decisions.</li> <li>• Need to advocate for proper planning and sustainable development, including critical infrastructure.</li> </ul>
<p><b>Local Government</b></p>	
<p><b>Local Authority Members Association (LAMA)</b></p>	<p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• Flood relief schemes and the regular maintenance of our rivers and streams to expedite the flow of water in advance of such events is critical to prevent areas prone to flooding from been affected time and time again.</li> </ul>

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	<p><b>Regional Growth and Ambition</b></p> <ul style="list-style-type: none"> <li>• The regions in decline need to be considered in a different way from what has been the practice heretofore if we are to reverse decline and deliver balanced regional development. The prioritisation of critical infrastructure to bring such areas up to par with the rest of the country needs to be a key objective and should also be reflected in the national development plan. The Atlantic Economic corridor is critical to this as indeed is the delivery of The All Island Rail Review.</li> <li>• Rural Ireland and Rural housing needs specific mention and special consideration. The publication of Rural housing guidelines are critical to same.</li> </ul> <p><b>Compact Growth</b></p> <ul style="list-style-type: none"> <li>• Our town and village centres are in serious decline consideration is needed for them to play a vital role in in addressing our housing crisis along with other functions.</li> </ul> <p><b>Digitalisation</b></p> <ul style="list-style-type: none"> <li>• The delivery of high speed broadband is critical and should be driven at an accelerated rate.</li> </ul>
<p><b>Professional Institutes</b></p>	
<p><b>Engineers Ireland</b></p>	<p>Strongly supportive of all of the recommendations contained in the Expert Group Report.</p> <p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• In terms of sustainable mobility and large scale decarbonisation of the transport sector the rapid build-out of an enhanced <b>National Energy Grid</b> is absolutely key and central to this, as well as its impact on the switch from carbon-based fuels for heating in both rural and urban settings. The importance of the Grid needs to be fully highlighted.</li> </ul> <p><b>Population and Demographics</b></p> <ul style="list-style-type: none"> <li>• Better demographic modelling needed incorporating early warning indicators if deviating from base assumptions.</li> <li>• What mechanisms are available to change course in relation to housing provision, infrastructure provision, energy provision (specifically electricity for transport and heating) and environmental capacity if our needs are much higher than forecast or there is not a mitigation to more moderate housing targets in the longer run?</li> </ul> <p><b>Regional Growth and Ambition</b></p> <ul style="list-style-type: none"> <li>• Five years into the NPF/NDP, it is not at all clear that the strategy (NPF) and investment (NDP) are aligned and mutually supportive. There are many projects outlined in the NDP for delivery by 2027 that have not commenced and will not be completed by 2027. What are the consequences for Regional Balance, City Growth and Compact Urban Growth of the failure to deliver these projects? There is a need to improve prioritisation, implementation and monitoring of the NPF/NDP.</li> </ul> <p><b>Compact Growth</b></p> <ul style="list-style-type: none"> <li>• A consistent theme from Engineers Ireland is that there must be a clear understanding that we should be providing civil (transport, energy,</li> </ul>

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	<p>water/wastewater, communications, waste) and social (education, social housing, health, leisure) infrastructure in advance where possible to facilitate growth and orderly land use planning. It is not at all clear that this infrastructure-led planning and development is actually taking place consistently.</p> <ul style="list-style-type: none"> <li>• The linkage between compact growth and climate action needs to be fully considered in the revision, as the policy implications for planning and development are very deep and very wide-ranging.</li> <li>• Need to be planning infrastructure provision for greenfield as well as brownfield sites ahead of time rather than trying to service the sites later.</li> </ul> <p><b>Digitalisation</b></p> <ul style="list-style-type: none"> <li>• Retail services are key to the attractiveness of urban areas and support to compact growth. Rural villages and small rural towns are particularly vulnerable to becoming less attractive to locals and potential migrants through loss of retail and other services.</li> </ul> <p><b>Investment and Prioritisation</b></p> <ul style="list-style-type: none"> <li>• The NPF should clarify the key roles and should advocate for the establishment of an investment and prioritisation planning body for critical infrastructure. EI believe that there is much useful data and analysis in the UK National Infrastructure Assessment that can also inform Ireland’s consideration of infrastructure provision and improvement to support the NPF and NPD.</li> </ul>
<p><b>Irish Planning Institute (IPI)</b></p>	<p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• The revised NPF should seek to name the principles for identifying priority locations for the deployment of infrastructure — including that necessary for decarbonisation — at a strategic scale across the country.</li> <li>• The NPF also requires a strategy for delivering infrastructure such as port and harbour infrastructure capacity to develop, service and maintain offshore renewables capacity and supply chain economic activities.</li> <li>• For all renewables, onshore and offshore, it is critical that policy provides a clear pathway for industry and communities and that it retains and provides confidence and certainty to all stakeholders in the current system.</li> <li>• More consideration should be given to locating renewable development on brownfield sites such as industrial areas that have capacity to absorb it. The revised NPF also needs to engage with the strategic national approach to a range of decarbonisation technologies such as biogas, hydrogen and anaerobic digestion.</li> <li>• The implications of carbon pricing for the planning system and the role of planning authorities in quantifying the impact of decisions on GHG emissions in a consistent manner requires engagement with practitioners.</li> <li>• In addition to revising the text of the current climate NSO and associated NPOs to reflect our increased obligations to achieve a climate resilient, biodiversity rich and climate neutral economy by no later than the end of the year 2050, the revised NPF should place further emphasis on adaptation to the impacts of climate change and the need to reduce the vulnerability of current and future buildings and infrastructure. This includes in the area of coastal zone management, noting the recommendation of the Climate Change Advisory Council in its Annual Review 2023 that “Given rising sea levels, a Coastal Management Strategy is urgently needed to help actively manage our changing coastlines”.</li> </ul>

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- To assist in the issues identified regarding, for example, alignment, biodiversity, spatial data and infrastructure, there should be a commitment to present the revised NPF and arising plans and strategies in map based forms, so that corridors for infrastructure are preserved, SEA for energy infrastructure is carried out and constraints in relation to biodiversity/high quality landscape etc. are identified on a strategic national basis.

### **Population and Demographics**

- Local Authorities should feed into the projected population targets as part of the NPF process based on a rigorous local level assessment.
- The revised NPF should articulate and set out a coherent approach to the development of a greater suite of options for housing for our ageing population and people with disabilities.

### **Regional Growth and Ambition**

- Both the NPF and Climate Action Plan 2024 (CAP24) would benefit from strengthening the commitment to balanced regional economic development which is central to national and regional policy. This must be underpinned by the required level of infrastructure investment, project delivery (especially enhanced inter-regional connectivity across multi-modal transport, digital connectivity and energy grid) and skills development.
- The Institute believes there is significant progress required to achieve the National Strategic Objectives of balanced regional growth. Significant investment is required to deliver sustainable transport infrastructure and enhance port infrastructure to enable effective regional growth, sustainable development, economic and employment stimulus in regional cities and towns.

### **Compact Growth**

- Transport oriented development is key and the IPI believes that there should be a greater focus on retrofitting the existing urban environment to enhance connectivity and permeability.
- Compact growth should also recognise climate impacts, particularly those associated with increased impermeable surfaces, building design in relation to indoor solar gain as well as microclimate impacts etc. and the use of Green Infrastructure to address flood risks and overheating.
- Further strong, reasonable and viable alternatives to the construction of one-off housing in the countryside must be put in place. The IPI supports the delivery of affordable serviced sites in our towns and villages as an alternative to building one-off housing in the countryside.
- When reviewing compact growth targets, adequate consideration must be given to evidence regarding the activation rates of zoned brownfield land given costs, infrastructure constraints, title complexities etc. as without regard to these setting higher brownfield targets risks increasing housing supply deficiencies in the short to medium term.

### **Investment and Prioritisation**

- To increase housing output there must be greater coordination between bodies such as Transport Infrastructure Ireland, Irish Water and Local Authorities as well as

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	<p>more funding for essential infrastructure. The IPI favours significant investment in delivering wastewater and water service infrastructure to make villages and rural towns attractive to live and work in and ensure compact growth.</p> <ul style="list-style-type: none"> <li>• A matter that has limited attention in the Issues Paper is the spatial and functional integration between Ireland and Northern Ireland now that the implications of Brexit, for example, are better understood than at the time of the preparation of the NPF. As an all-island body this is a matter of particular interest to the Institute.</li> <li>• The need to adequately resource the planning system at national, regional and local levels across sectors is also essential to the delivery of the ambition of the NPF. The planning system must be adequately resourced to deliver the quantum of housing, services and infrastructure required to support sustainable communities and the issue of resourcing and the capacity of the system has become more acute since the NPF was first adopted.</li> <li>• Regarding governance and institutional matters, policies in the revised NPF must be more specific and measurable against known benchmarks. Integration with the current climate policy and emerging MSP policy framework since the NPF's adoption is also required.</li> </ul>
<b>Public bodies</b>	
<b>An Bord Pleanála (ABP)</b>	<p>As a national strategic document, the NPF should provide high-level policy guidance for more prescriptive policy at a local level in regional and development plans.</p> <p>As the Board is a national appeals body and does not involve itself in formulating national policy, the following comments are restricted to the extent to which policies and objectives in the NPF can assist ABP in its decision making remit:</p> <ul style="list-style-type: none"> <li>• A critical issue for the Board in policy implementation is the alignment of national and local policy. The primacy of the development plan (CDP) over national policy has been established in recent case law (Brophy v ABP, Murtagh v ABP). In order for ABP to have regard to national policies in making determinations on planning applications, it is imperative that national policy is explicitly and unambiguously referenced in the CDPs. Where necessary, the CDP must be varied and aligned as expeditiously as possible to fully reflect national policies.</li> <li>• The Board has experienced on occasion misalignment between NPF and CDP eg in relation to housing targets and renewable energy targets and policies.</li> <li>• Policy objectives in the NPF need to be clear and formulated in such a way that they can be implemented in lower tier regional, county and local plans.</li> </ul> <p>1. There should be a clear commitment in the NPF to support identified large infrastructure projects such as transport, renewable energy and water/wastewater infrastructure. To include in the NPF a list of specific projects to be implemented over the lifetime of the NPF would benefit ABPs decision making.</p>
<b>Office of the Planning Regulator (OPR)</b>	<p>The issues paper sets out a very comprehensive context for the first revision of the National Planning Framework.</p> <p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• Quantifiable actions to address climate action and biodiversity should prioritise and support development forms and patterns that reduce energy consumption.</li> </ul>

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	<ul style="list-style-type: none"> <li>• The key points of linkage and interaction between onshore and developing offshore energy systems also need a greater focus in the revision.</li> </ul> <p><b>Regional Growth and Demographics</b></p> <ul style="list-style-type: none"> <li>• Cross-sectoral policy co-ordination, monitoring and action to drive the progress of the regional cities and their wider environments is required. Governance and implementation of the city regions needs further consideration and supports for the MASP areas, possibly requiring legislative, budgetary and policy supports.</li> <li>• The revision could factor in the longer lead-times for housing delivery on large and complex brownfield regeneration projects, shifting the viability points of such projects while putting in place safeguards to direct any short to medium term under-provision within metropolitan areas to the locations with the best mix of opportunities for public transit oriented development and energy efficient development.</li> <li>• Strengthen the level of ambition in relation to promotion of age-friendly housing.</li> </ul> <p><b>Compact Growth</b></p> <ul style="list-style-type: none"> <li>• Compact growth should also recognise the fundamental need to ensure that growth occurs in our main cities and towns rather than in the wider commuting hinterland.</li> <li>• To surmount the affordability and viability challenges to delivering compact growth much more effective integration between planning, housing and budgetary and fiscal policy will be required.</li> <li>• In order to fully realise national ambitions on climate, biodiversity and other aims, the compact growth targets should be increased along with a much greater emphasis on public-sector led and funded demonstration projects to show to the public how compact growth can work and make dramatic improvements to quality of life and community.</li> </ul> <p><b>Digitalisation</b></p> <ul style="list-style-type: none"> <li>• The new and emerging trends in relation to economic drivers of cities and towns require significantly more evidence driven urban data gathering systems.</li> <li>• Digital transformation coupled to distinctive geographic (such as island communities) or smart regional specialisations offer new opportunities for strengthened regional and rural economic performance, which planning policies should recognise and enable.</li> </ul> <p><b>Investment and Prioritisation</b></p> <ul style="list-style-type: none"> <li>• Strengthen the process of co-ordination of planning and public investment and prioritisation in both physical and social infrastructures and programmes with a greater system of appraisal and then prioritisation of investment critical to enabling regional ambition.</li> </ul>
<p><b>Regional Assemblies</b></p>	
<p><b>Eastern and Midland Regional Assembly (EMRA)</b></p>	<p>Welcomes stakeholder engagement.</p> <p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• The Regional Assembly would welcome a focus on sustainable development patterns which promote compact growth, reduce transport demand and encourage</li> </ul>

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	<p>low carbon transport modes; sustainable transport systems (people and freight); carbon storing and sequestering land uses; energy efficient buildings and industry; and renewable energy in the revision.</p> <p><b>Population and Demographics</b></p> <ul style="list-style-type: none"> <li>• Whilst supporting the overall framework of the NPF and the commitment to balanced regional development, the Assembly supports the statement within the Issues Paper that reflection is needed on the spatial distribution of population growth evident in the census results.</li> <li>• The Regional Assembly would encourage the inclusion of planning policies for an aging population in its revision.</li> </ul> <p><b>Regional Growth and Ambition</b></p> <ul style="list-style-type: none"> <li>• The Regional Assembly agrees that regional growth needs to be balanced further throughout the remainder of the Country, however, it is important that the revision of the NPF recognises the importance of Dublin, and its supporting hinterland, the MASP area, as an international city of scale, and the focus needs to remain on protecting the capital city and the Eastern region in this respect.</li> <li>• important to note that the Midland Region is underperforming with respect to population growth. The NPF should address this intraregional imbalance within the Eastern and Midland Region.</li> <li>• Statutory support mechanisms relating to MASP delivery are required.</li> </ul> <p><b>Compact Growth</b></p> <ul style="list-style-type: none"> <li>• The Regional Assembly agrees that the focus on compact growth should be strengthened, and consideration should also be afforded to defining, measuring and monitoring compact growth, in order to ensure its delivery.</li> </ul> <p><b>Digitalisation</b></p> <ul style="list-style-type: none"> <li>• The Regional Assembly encourages the focus of the review of the NPF with regards to the advancements in digitalisation and technologies to be directed to supporting policies such as smart specialisation and clustering.</li> </ul> <p><b>Investment and Prioritisation</b></p> <ul style="list-style-type: none"> <li>• The inclusion of a clear Implementation, delivery and monitoring framework for the NPF may be beneficial.</li> <li>• Act should be strengthened to ensure Regional Authorities can align with the NPF and that a robust reporting structure is in place.</li> </ul>
<p><b>North West Regional Assembly (NWRA)</b></p>	<p>Supportive in general of the Issues Paper. Key recommendations below:</p> <ul style="list-style-type: none"> <li>• NWRA region is falling behind the other regions in the country in terms of GDP, therefore direct targeted integrated investments to the identified regional growth centres is required.</li> <li>• Further consideration of rural development and communities required</li> <li>• The concept of spatial equity should be expanded to show how it could impact on the revised NPF.</li> <li>• Needs to be further discussion on introducing positive stimuli to make brownfield a more attractive option.</li> </ul>



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	NWRA also made specific suggestions to clarifying and making amendments/updates to the text within the Issues paper.
<b>Southern Regional Assembly (SRA)</b>	<p>Supportive in general of the Issues Paper. Key recommendations below:</p> <ul style="list-style-type: none"> <li>• Limited attention given to rural areas, which should be addressed with the emphasis on ‘Strengthening urban and rural areas together’ and how the NPF delivers for all communities.</li> <li>• The document uses a variety of terms and descriptions to discuss the issues of city/metropolitan growth particularly relating to Dublin with limited reference to the MASPs. There should be greater reference to the MASPs as a concept Planning applications in the system should be considered against Development Plan under which the application was lodged in order to ensure against undue delays in the delivery of housing.</li> <li>• The revision should consider as to how we can broaden out the drivers that achieve change beyond zoning &amp; infrastructure including economic development &amp; quality of life issues.</li> <li>• The revision should highlight the scale of the challenge for the NPF with managing the level of and impact of change required. New approaches and ways of working may be required to respond to this change. There could be acknowledgement as well as the need for engagement, or commitment to these challenges across society and political level – the benefits (and achievements) should be pointed out as well as being up front on the challenges.</li> <li>• SRA also made specific suggestions to clarifying and making amendments to the text within the Issues paper.</li> </ul>
<b>Rural</b>	
<b>Irish Creamery Milk Suppliers Association (ICMSA)</b>	<p>ICMSA is supportive of the need for an overarching planning framework to ensure optimum efficiency and co-ordination between the diverse range of actors and stakeholders in developing infrastructure and for the proper planning for future needs of the people of our country.</p> <p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• Irish agriculture is in a unique position to support climate change and biodiversity improvement. However, the carbon efficiency of our existing production systems and our current contribution to biodiversity needs to be recognised and acknowledged.</li> <li>• ICMSA supports the development of renewable energy technologies, however the significant impact on land use has to be considered as a contribution from the agriculture sector. The 25% reduction target for the agriculture sector needs to recognise agriculture’s contribution to other sectors meeting their targets.</li> <li>• Significant agricultural land take involved with renewable technologies, particularly solar and the feedstock required for biogas.</li> <li>• To note It there are targets in relation to land rewetting, organic farming, tillage area and reduced intensity grasslands, all of which are competing with existing farming enterprises, renewables and forestry. There needs to be a recognition that the</li> </ul>



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	<p>demands from other sectors to reduce or mitigate emissions have a very direct and negative impact on the agriculture sector to meet its goals and maintain economic sustainability through a reduction of the land base and production capacity.</p> <ul style="list-style-type: none"> <li>• The current policies to encourage community involvement in renewable energy projects have abjectly failed to deliver and needs to be revisited and revised.</li> <li>• With climate change and greater risk of flooding and related weather events, the NPF needs to take account of such risks and support necessary measures to minimise the impact of flood and related weather events.</li> </ul> <p><b>Population and Demographics</b></p> <ul style="list-style-type: none"> <li>• The NPF must be capable of adjusting in real time to sudden changes and surges in demand for housing and services.</li> </ul> <p><b>Regional Growth and Ambition</b></p> <ul style="list-style-type: none"> <li>• Agriculture will play a very significant role in ensuring balanced regional development but this role is being considerably undermined by excessive regulation and the failure of Government to support the sector as it further improves its sustainability.</li> <li>• The future demand for housing must not be inhibited by unreasonable planning restrictions on rural housing development. Clustering of houses and group water and waste facilities should be considered in order to reduce the overall footprint and land take of non-farm based rural housing. It is important that young people can continue to live in their local communities and deliver from an economic and social perspective to a sustainable community.</li> <li>• Recent proposals to halt major new road developments are contrary to the policy to balance regional development deficits and will have an overall negative impact on our national economy.</li> </ul> <p><b>Investment and Prioritisation</b></p> <ul style="list-style-type: none"> <li>• For rural dwellers, it is necessary to use motor vehicles to access the railway network and the provision of adequate and economically priced car parking is a prerequisite.</li> <li>• A streamlined planning system is required to ensure necessary projects are not unnecessarily delayed.</li> <li>• The Residential Zoned Land Tax (RZLT) is having unintended consequences in some areas where land that is being farmed for generations and that is highly unlikely to be used for housing for decades is subject to the RZLT.</li> </ul>
<p><b>Irish Rural Link</b></p>	<p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• Alignment required between sectors – NPF should have measures in place to ensure sectors align.</li> </ul> <p><b>Population and Demographics</b></p> <ul style="list-style-type: none"> <li>• Planning needs to begin for our aging population, such as rural transport, access to health services.</li> <li>• Need to try and retain some young people in rural areas.</li> </ul> <p><b>Regional Growth and Ambition</b></p> <ul style="list-style-type: none"> <li>• The revised NPF should align with the actions contained within <i>Our Rural Future</i>.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Living in rural villages should be made attractive. This means a better use of space including planning for workspace, planning for housing, access to transport, health, schools, green spaces.</li> <li>• Prioritisation to be given for better regional balance, not just in terms of population but in attracting quality employment.</li> </ul> <p><b>Compact Growth</b></p> <ul style="list-style-type: none"> <li>• New rural housing should be directed towards rural towns and villages and to restrict new urban-generated rural housing elsewhere as we believe living in or close to a rural town or village is essential to developing sustainable communities and ensuring their vibrancy. However, farmers and their successors as well as those in value added agricultural businesses need to be allowed to continue build their homes on or beside the farm.</li> <li>• Need consistency of planning between local authorities.</li> <li>• Towns and villages need access to water supply and waste water infrastructure.</li> </ul> <p><b>Digitalisation</b></p> <ul style="list-style-type: none"> <li>• Access to high quality broadband required.</li> <li>• Supports for people who have little to no digital skills.</li> </ul>
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**Social / Economic**

<b>Age Friendly Ireland</b>	<p>Sets out current national policy context, the international context, the role of Age Friendly Ireland in the delivery of age friendly programmes and referencing resources available on the <a href="http://www.agefriendlyhomes.ie">www.agefriendlyhomes.ie</a> website.</p> <p>Largely focussed on <b>population and demographics</b> but cross-cuts other themes:</p> <ul style="list-style-type: none"> <li>• Scale of the challenge where there are almost 800,000 people aged 65 and over in Ireland in 2022 (an increase of 35% since 2013), and this is expected to increase to 1.6 million people by 2051 due to increasing life expectancy and a falling birth rate. The CSO Older Person’s Information Hub provides statistics on lives of older people.</li> <li>• The challenge of changing needs can be mitigated by developing age friendly environments and services that take a life course and Universal Design approach, so people regardless of their age, size, ability or disability can access them.</li> <li>• Public realm and built environment should be designed in line with crime prevention through environmental design (CPTED) and encourage multi-generational usage eg outdoor exercise, walkways, cycleways (accessible for triobikes), public toilets, accessible benches, seating, age friendly parking close to amenities etc.</li> <li>• Transport infrastructure should accommodate older people regarding accessibility, route planning and rural access.</li> <li>• In 2021, almost half of people aged 75 and over had never used the internet. Older people in rural communities are particularly affected by the digital divide. Need to ensure broadband infrastructure to support the transformation of health care wrt future use of assistive technologies and digital supports for health and ageing.</li> <li>• Digitalisation can increase loneliness but also offers opportunities for connection.</li> <li>• Need to consider people will be working further into later life. Remote working hubs, home offices, and digital infrastructure will be needed to support older people in employment (in line with increased retirement age).</li> </ul>
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	<ul style="list-style-type: none"> <li>• Population-based planning through Regional Health Areas, location of acute hospitals, Primary Care Centres, transport links, HSE estate management, land banks and their uses. Ensure that health care infrastructure for all stages is delivered in proportion to the needs of the ageing population.</li> <li>• Age friendly housing standards should utilise the Centre for Excellence in Universal Design’s <i>‘Building for Everyone’</i> and forthcoming UD Homes checklist. Utilise Age Friendly Ireland’s <i>Pre Planning Guidelines for Long-term Residential Care</i>.</li> <li>• The Housing Agency’s Research showed a strong positive financial benefit from each of the three models of Supported Housing (Independent, Assisted and Specialised). The NPF should give consideration to supported housing models and ensure suitably located Age Friendly developments and sufficient zoning for community facilities.</li> <li>• In March 2023 the Department estimated 4,000-8000 properties are vacant where people have moved to long term care. Planned reform of the Fair Deal scheme seeks to unlock further housing for the rental market.</li> <li>• Numbers in long-term residential care could be reduced with age friendly housing, centrally located services (ageing in place), and community supports.</li> <li>• Age Friendly Ireland’s submission sets out specific recommendations for the review of NPF are as follows:             <ul style="list-style-type: none"> <li>○ Include detailed analysis of 2022 Census data and population projections</li> <li>○ Accentuate the PfG vision of an Age Friendly Ireland in particular Ageing in Place i.e. Age Friendly housing in town centres, Age Friendly Towns.</li> <li>○ Transportation and legislative change where required.</li> <li>○ Outline a policy approach to addressing the significant under-occupancy.</li> <li>○ Establish criteria for infill/brownfield sites and vacant homes</li> <li>○ Set objectives for the delivery and monitoring of Age Friendly Housing</li> <li>○ Mandate long-term residential care developments to be situated within proximity of town centres and public transport</li> <li>○ Reference the Review of the Housing Adaptation and Energy grants</li> <li>○ Consider the location of planned health care facilities relative to Regional Spatial Plans and County Development Plans</li> <li>○ Include a programme of work for Age Friendly Towns – cross cutting with Active Travel, Healthy Cities and Universal Design of the Public Realm</li> <li>○ How older people in rural communities will be supported with appropriate transport, digital infrastructure, housing and community facilities.</li> <li>○ Recommend a review of Building regulations relative to AF/Universal Design</li> <li>○ Refer to the Public Spending Code and stipulate how AF can be embedded in capital and current plans at tender stage (Age Friendly Procurement)</li> <li>○ Set out changes in transport services to accommodate an ageing society.</li> <li>○ Promote a co-design approach in Public Service Design Principles</li> <li>○ The objectives of the revised NPF should be translatable and aligned into Regional Spatial and Economic Strategies, County Development Plans and Local Area Plans and the Planning and Development Act 2000.</li> </ul> </li> </ul>
<p><b>State Agency</b></p>	
<p><b>Enterprise Ireland</b></p>	<p><b>Climate Transition and our Environment</b></p> <ul style="list-style-type: none"> <li>• Comprehensive proofing of the NPF against CAP 2023 is required, the link to the National Investment Framework for Transport in Ireland (NIFTI) is also key in this regard. The NPF should account for a range of net zero opportunities including</li> </ul>

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offshore wind development (including new industrial strategy), solar and district heating.

- It would be beneficial for the NPF revision to align with the White Paper on Enterprise and the forthcoming National Clustering Framework.
- Consideration is required around spatial planning for Ireland's future net zero ambitions. For example, port and grid infrastructure, and workforce planning to meet Ireland's Offshore Wind ambitions.

### **Population and Demographics**

- Alignment of population planning models is required with recent population trends and projections, considering scenarios for migration and other trends, including obsolescence rates and household size (headship) trends.

### **Regional Growth and Ambition**

- To accelerate housing construction EI is driving its 'Built to Innovate' initiative. This programme aims to achieve faster, higher quality construction of housing by providing funding support for productivity training, innovation, and the introduction of digital, paperless systems.
- Significant investment in high quality public transport and the completion of all road investment projects outlined in the National Development Plan (where feasible) is vital to improving the mobility of the labour force and the interconnectivity of Irish regions.
- Under its 2022-24 Strategy, Enterprise Ireland is targeting the creation of 70% of employment outside of Dublin.
- Governance structures need to be put in place for effective MASP development - each of our cities should have a MASP Board, consisting of organisations including the infrastructure, environmental agencies, utility providers, higher education, and economic development agencies.
- Regional balanced targets may need to be further calibrated to more fully reflect economic trends and impacts.

### **Compact Growth**

- In addition to brownfield sites, which can have higher complexity, other forms of Compact Growth could be considered. These include initiatives such as Density Intensification and Transport-Led Development which could build on other government policy developments such as the All Island Strategic Rail Review and the DART+ Programme.
- EI welcomes the publication of the new Sustainable and Compact Settlements Guidelines for Planning Authorities as soon as possible.

### **Digitalisation**

- Urban agglomeration effects are still very important for jobs and the economy.

### **Investment and Prioritisation**

- Merit in examining strengthened structures for cross-Government engagement on the delivering the NPF and NDP and their alignment with sectoral strategies.
- The NPF should identify the factors which are driving divergent levels of population growth across Ireland's towns and cities, including demographics, the availability of transport links, infrastructure, housing, access to services, and their

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	<p>proximity to third level institutions and industry clusters. It should highlight barriers to delivering on these factors for those locations which are lagging behind. It should identify interventions required to address same and, correspondingly, ensure that the NDP is very tightly aligned to deliver on these interventions.</p>
<b>Housing Agency</b>	<p><b>Compact Growth</b></p> <ul style="list-style-type: none"> <li>• Consideration to be given to the reduction or removal of the current mandatory two-year timeframe for property vacancy eligibility. This change would allow more properties to qualify for grants and planning exemptions.</li> <li>• HA supports mixed use development - a new or adapted planning exemption that accommodates the conversion of commercial units into "Working Homes" could be further explored as a potential model.</li> <li>• Small scale improvements within towns can often have a substantial impact, such as the 'start spreading the mews' proposal, which centred on the revitalisation of mews lanes to create new housing opportunities within these underutilised spaces. There is a need for national-level objectives to foster and support these types of small-scale improvements.</li> </ul>
<b>IDA Ireland</b>	<p>Documents to note include White Paper on Enterprise 2022 – 2030, Ireland’s Trade and Investment Strategy 2022-2026: Value for Ireland, Values for the World, Driving Recovery and Sustainable Growth 2021 – 2024 (IDA Ireland).</p> <p><b>Regional Growth and Ambition</b></p> <ul style="list-style-type: none"> <li>• IDA Ireland is committed to the pursuit of more balanced, compact regional development, with 52% of new investments in 2022 going to regional locations outside of Dublin. Between 2013 and 2022, there was a 7% decline in the FDI manufacturing sector. IDA believes that a contributing factor to this decline is the lack of availability of land zoned for large-scale manufacturing development in advance of demand. The lack of available suitably zoned lands of scale to support large-scale manufacturing activities has the potential to inhibit future balanced regional development by directly impacting on the ability of regional locations to meet their ambitious employment and population growth targets.</li> <li>• These projects typically accommodate 300-500 employees on sites of c. 25-35 hectares and more recently have included aspects of auto-generation renewable energy sources such as wind or solar PV arrays.</li> </ul> <p><b>Compact Growth</b></p> <ul style="list-style-type: none"> <li>• A specific cohort of large-scale manufacturing projects do not fully align with the concept of compact growth due to the requirement for large sites, which are typically only available on the edge of urban areas.</li> <li>• While some provision is made in the current NPF for Strategic Employment Growth at regional, metropolitan and local level, the absence of clarity in this regard, has resulted in the predominant emphasis on compact growth regardless of employment scale or type. Provision needs to be made in the revision of the NPF to accommodate this cohort of large-scale manufacturing projects.</li> <li>• A centrally coordinated, cross-Government approach to clustering is being established by the Department of Enterprise, Trade and Employment.</li> </ul>

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### Land Development Agency (LDA)

A key objective of the LDA under the LDA Act 2021 is to support the implementation of the NPF and deliver low carbon and climate resilient development. It is in this context that the LDA considers it as imperative that the role, mandate and ability of the LDA to develop and deliver low carbon residential development nationwide is appropriately represented in the NPF revision and that the role of the LDA in developing affordable housing is highlighted.

#### Climate Transition and our Environment

- Support for innovative and non-traditional forms of housing and housing delivery mechanisms should be included in the forthcoming review, including opportunities for demonstrator projects and innovation to address issues such as achieving low or zero carbon, modern methods of construction and or materials to achieve quality, efficiency and cost effectiveness.

#### Population and Demographics

- The LDA supports this direction of focus in the revision. In support of and aligned with this, the LDA is recommending that Housing Delivery be included as an additional key theme in the revised NPF. This is considered important to recognise the context and scale of the housing challenge and priority objective and investment that is ongoing by Government to address identified housing needs and requirements, as well as viability and particularly to scale up delivery of 'affordable housing'.
- The Government has introduced several key policy initiatives and legislation including LDA Act 21, The Affordable Housing Act, and Housing for All strategy 2021, all have been put in place since the NPF was first published. This context and priority focus is recommended to be reflected in the NPF review to reflect the key role of LDA in housing delivery and key measures and interventions being implemented to drive housing delivery. This is particularly affordable housing deliver in support of social and community development and wellbeing and as an enabler of economic growth in Ireland. The cost rental model of housing is considered a key initiative to be recognised and highlighted within the National Development Plan.

#### Regional Growth and Ambition

- Important to consider the role of the metropolitan cities and key towns as drivers for growth and achieving rebalancing and supporting ongoing vitality and viability of the urban areas and their hinterlands /catchment areas.
- Enhance economic development corridors with improved connectivity between the regional cities to support regional rebalancing and achieve more critical mass to support their ongoing vitality and sustainable development.

#### Compact Growth

- The LDA recognise and strongly supports the prioritisation of development within urban areas and appropriate densification of existing settlements.
- In support of this, key statutory responsibilities that the LDA has include the Register of Relevant Lands (identifying all relevant public lands as defined under the LDA Act 21) and the publishing of the first Report on Relevant Public Land (identifying areas with potential for development for future housing subject to the lands being made available, planning and due diligence process) are key areas that support the NPF's aims.

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- A key factor in the facilitation of a meaningful shift towards compact growth and managing travel demand, especially within the key cities, is the prioritisation of infrastructure that supports with unlocking brownfield land for housing and urban living. It is considered that National Transport Authority (NTA) – Public Transport Accessibility Levels (PTALs) Methodology, which takes into account, public transport stops, services and frequency and walking network and offer a potential methodology to address this issue. It is recommended that the NPF include an objective methodology for use for the identification of sites, within the five cities, that offer significant potential for development in the public interest which are best served by public transportation and by association suitable for the highest densities of development.
- A priority focus for the NPF is recommended on identifying the barriers and putting in place policy measures to support and promote higher levels of brownfield reclamation/ development for housing and mixed use in well serviced central locations.
- It is recommended that a significant brownfield target be included in the NPF for housing development on brownfield sites to support low carbon development objectives. However, it is important to ensure that this will be supported by public investment and policy measures to address the complexities of brownfield redevelopment and especially the viability challenges. Also note that the inherent cost differential between ‘greenfield’ and ‘brownfield’ development is typically not recognised in the Section 48 Development Contributions Schemes of Local Authorities. Development Contributions in most Local Authority Schemes do not differentiate between brownfield or greenfield development, with the cost per unit of dwelling being the same in both instances.

### **Investment and Prioritisation**

- Regular monitoring and trend analysis is recommended to be built in to ensure that delivery keeps apace with requirements in line with compact growth objectives. Consideration of the need for some flexibility will be important with monitoring and trend analysis over time to identify how targets are being achieved and if any changes or further reviews needed to ensure effective and timely policy responses where needed.
- A priority focus for the NPF is recommended to be taken for sites for development and or regeneration of scale that demonstrate transformative potential. The NPF should consider and highlight the potential for Strategic Areas/ Regeneration Areas to contribute to achieving key brownfield targets for reclamation and delivering wider socio-economic benefits for the key cities and towns.
- It is recommended that a monitoring and reporting regime be developed working with Local Authorities, to monitor pipeline planning proposals from pre-application to the commencement stage, which would afford the opportunity to identify blockages/ issues and target resources to maximise the delivery of housing.



## 2.0 List of Submissions Received from Planning Advisory Forum members

No.	Sector	Name
1	Business and Industry	Construction Industry Federation
2	Business and Industry	IBEC
3	Business and Industry	Irish Institutional Property
4	Business and Industry	Property Industry Ireland
5	Cross Border	Department for Infrastructure Northern Ireland
6	Cross Border	International Centre for Local and Regional Development (ICLRD)
7	Cross Border	Inter Trade Ireland
8	Environmental Agencies	An Taisce
9	Environmental Agencies	Heritage Council
10	Environmental Agencies	Irish Environmental Network
11	Infrastructure	Eirgrid
12	Infrastructure	ESB Networks
13	Infrastructure	NTA
14	Infrastructure	TII
15	Infrastructure	Uisce Éireann
16	Local Government	Local Authorities Members Association
17	Professional Institutes	Institute of Engineers Ireland
18	Professional Institutes	Irish Planning Institute
19	Public Body	An Bord Pleanála
20	Public Body	Office of the Planning Regulator
21	Regional Assembly	Eastern and Midland Regional Assembly
22	Regional Assembly	Northern and Western Regional Assembly
23	Regional Assembly	Southern Regional Assembly
24	Rural	Irish Creamery Milk Suppliers Association (ICMSA)
25	Rural	Irish Rural Link
26	Social / Economic	Age Friendly Ireland
27	State Agency	Enterprise Ireland
28	State Agency	Housing Agency
29	State Agency	IDA
30	State Agency	Land Development Agency (LDA)