

# Report of Expert Group for the First Revision of the National Planning Framework

15 August 2023

## Overview

The Expert Group considers that the *National Planning Framework 2018 (NPF, 2018)*<sup>1</sup> represented a very important step in the development of national spatial planning in Ireland. The Group has concluded that the foundational principles in *NPF, 2018* remain strong and highly relevant and that the NPF provides an opportunity for Ireland to embed good spatial planning in all relevant areas of policy. Its focus on the importance of Place in our lives, and its strong vision for balanced spatial planning and greater spatial coherence are, and will continue to be, relevant in the decade ahead. The urgency of good spatial planning is essential at a time when Ireland faces significant demographic changes, when environmental and climate issues take on new prominence, and when major economic and social changes emerge across the globe.

The Group recommends that the NPF revision getting underway should build on *NPF, 2018* and strengthen it in three broad respects. Firstly, the new targets should be more ambitious and more clearly defined (Section 3). Secondly, the roles of the bodies involved in its implementation should be clarified and strengthened (particularly in relation to the Metropolitan Area Strategic Plans) and mechanisms put in place for more detailed measurement and monitoring of its progress (Section 4). Thirdly, there should be greater coordination at whole of government level across all infrastructure projects (including the NDP) and new efforts made to generate broader support for national spatial planning across all of society (Section 5).

## Members of the Expert Group:

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<sup>1</sup> NPF (2018): Project Ireland – National Planning Framework. Rialtas na h-Éireann. Government of Ireland.

<sup>2</sup> The Group agreed that Frances Ruane would act as Chair.

# Table of Contents

Section 1: Introduction .....	2
Section 2: Issues Considered .....	3
Overview .....	3
Changing Context .....	5
Section 3: Spatial Coherence .....	8
3.1 Metropolitan cities .....	8
3.2 Compact growth: preventing further sprawl.....	9
3.3 Housing patterns in rural areas .....	10
3.4 Large-scale infrastructure projects.....	10
3.5 Other spatial planning challenges .....	11
Section 4: Implementation, Monitoring and Governance .....	12
Section 5: Coordination, Consultation and Advocacy .....	14
6: Concluding Comments.....	17
APPENDIX: Terms of Reference and Process of Preparing this Report .....	19

## Section 1: Introduction

1. The Expert Group was requested by the Minister for Housing, to provide a high-level overview of the Irish National Planning Framework (NPF), published in 2018, and identify matters to be considered in the first statutory assessment of the NPF this year. The Group's terms of reference and its approach to preparing the report are set out in the Appendix. The Group's Report examines the overall approach of the NPF in the face of the evolving trends that have come into clearer focus in the five years since it was first launched, including climate transition, regional development, demographic change, and digitalisation.
2. The Group concludes that the foundational principles in the NPF remain strong and highly relevant and that it provides an opportunity for Ireland to embed good spatial planning in all relevant areas of our policy making and policy decisions, reflecting the importance of Place in our lives. We endorse its strong vision for balanced spatial planning and greater spatial coherence.
3. The Group believes that there has been a historical tendency in Ireland to focus on the issues that surround individual planning applications along with debates around third party rights and the balance between private development rights and the common good. What is less developed, however, is how this speaks to planning at the spatial scale, namely, at the levels of sub-region, the city, the region or the State as a whole. The reality is that, for the most part, the built environment is shared, and Ireland needs to develop a broader understanding of spatial planning, where the focus is on the collective interest.
4. The built environment envisaged in the NPF has the potential to improve the well-being of people and communities in the decades to come if it is embedded in the decision-making frameworks of all relevant policy areas, particularly where major investments in housing, transport, energy and other public infrastructures are involved. The Group recognises that there will be tensions and conflicts in the implementation of a spatial plan at this scale, and that this is to be expected and planned for. In these scenarios, the NPF will be seen to be effective if its core principles and objectives give greater clarity for decisions at the national policy level.
5. In our high-level review of the effectiveness of the NPF, we begin by taking a wide overview. Section 2 provides our summative comments on the NPF and how we see it working generally. We also speak briefly to the contextual changes since 2018 listed in our terms of reference and how they might be considered in the formal revision. We then explore three strands:

- I. *The soundness of the strategy itself and the essential planning ideas on which it is based.* This is discussed in Section 3 [Spatial Coherence] which reflects on the framework and identifies specific areas which the revision process should consider to strengthen it and make it more effective.
- II. *The extent to which the NPF is influential in guiding decision-makers as they make difficult choices for the common good.* This is discussed in Section 4 [Implementation, Monitoring and Governance], which looks specifically at how implementation is organised and monitored and the associated governance arrangements, noting areas where the revision process should consider possible changes, with a view to strengthening alignment within spatial planning in Ireland.
- III. *Whether the plan plays a tangible role in influencing the operational decisions of those actors to whom it is addressed.* This is discussed in Section 5 [Coordination, Consultation and Advocacy], which relates to the range of institutions, public bodies, development agencies, economic interests and civil society organisations that are active in the planning and sustainable development field. This section explores ways of achieving high-level coordination and of nurturing a broad base of commitment to the principles of the NPF and of developing advocacy for national spatial planning in contemporary Ireland.

## Section 2: Issues Considered

### Overview

6. In its discussions, the Group focused on the key elements in the National Planning Framework (NPF) designed to create a **coherent spatial planning framework** for Ireland. We considered how it is being implemented at national, regional, and local levels, and its relevance to and impact on the work of planning stakeholders, such as Local Authorities, the Office of the Planning Regulator and An Bord Pleanála, as well as development bodies such as the IDA and Enterprise Ireland.
7. We recognise that these are very early days in the implementation of what is Ireland's first comprehensive National Planning Framework. There is **very widespread support for the Framework**, and the need for the long-term and principles-based approach it takes. However, we have concerns that the targets in the current Framework are not ambitious enough or clearly defined enough to meet Ireland's current needs in particular, we believe that greater clarity is needed in relation to the implementation

of the NPF, and particularly to the implementation of the Metropolitan Area Strategic Plans.

8. A question for us is **whether the current NPF is detailed enough to guide decision making**. On the one hand, some people call for greater clarity and consistency to reduce uncertainty, while others look for more flexibility to address differential complexities. Whilst recognising the complexities and differences at a local and regional level, the Group would highlight that consistency is essential and that flexibility in implementation could undermine the NPF at such an early stage of its implementation.
9. A further question for us is whether the NPF revision **could provide guidance on, and seek to identify progress in relation to, spatial equity**. This could also help to provide a framework for regional and local authorities to address any geographical pockets of exclusion and disadvantage within their areas and to engage with diversity and inclusion issues related to planning where they arise.
10. It is well recognised that progress in embedding the NPF in policy making and decision-making processes has been delayed by the exceptional changes brought on by the evolution of working practices associated with Covid-19, and the acute shortage of specific skills (such as planning, economic, project management) that are relevant to the implementation process. Clearly the need to address the housing issue is critical, but more recognition is needed that **the National Planning Framework is about much more than housing**, and that alignment with decision-making on other public infrastructures is also required. A critical issue identified by the Group is that **all physical development projects be coordinated and plan-led to serve the public interest**.
11. The Group also discussed how well the NPF is being implemented and what appears to be working well/not working in the implementation process – at national, regional, and local level – including how the implementation process is being managed and monitored. Issues for the Group include:
  - I. **the extent to which the NPF drives infrastructural investment** and creates a more certain investment environment, whether in water/wastewater, transport, broadband, electricity grid, housing, etc;
  - II. **whether there are barriers to the NPF's implementation and delivery** that could be addressed, for example, through updating of the supporting legislation (e.g., in relation to building regulations) to align better with policies to deliver the ambitions of the NPF, and through the provision of additional resources to support greater efficiencies and more timely decision-making; and

- iii. **whether there are structures** in place to ensure that other areas of policy sufficiently incorporate the principles of the NPF in their development and are **sufficiently joined-up** to deliver decisions expediently across economic, social and environmental domains.
12. The Group is aware of **new governance and legislative arrangements** in relation to the planning system, including the finalisation of the new Planning Bill, which will clarify and enhance the status of Planning Policy and Guidelines; amend the focus and lifespan for Development Plans; and restructure An Bord Pleanála. The Group is also aware of **other initiatives**, such as the Residential Zoned Land Tax, the Town Centre First policy framework and the Urban Regeneration and Development Fund, as well as the forthcoming report of the Commission on Housing and the National Land Use Review which have the benefit of the NPF to inform their thinking.
13. Given that the rate of anticipated growth and development in Ireland is likely to result in significant change in nearly all parts of the country – both urban and rural – the Group also considered how this might affect the way we take into account **landscape issues at a strategic level**. Although Ireland’s landscape can be seen as a significant national asset, a core consideration is the idea that nearly all our places (even the most beautiful and sensitive ones) have some capacity to accommodate change without altering their intrinsic character. Making balanced planning judgements about this requires a rounded appreciation both of landscape values (the cultural and aesthetic importance that people attach to it) and of the sensitivities to different kinds of change that can be found in different landscapes. Because this has a strong spatial component, it is a subject that the NPF review should be mindful of, particularly in terms of alignment with emerging national landscape assessments, policies, and studies.
14. Fundamentally, the Group identified the **importance of ‘place’ for people and communities** in Ireland and recognised how good ‘place-quality’ is also sought by investors, civic leaders and those who are interested in how regions and city-regions compare with one another internationally. The Group considered how this should be addressed to ensure that the NPF results in a better appreciation of the importance of spatial coherence in Ireland’s future development.

## Changing Context

15. The Group is mindful of specific changes in the policy context that have come to the fore since the adoption of the Framework in 2018 and whether there were any ways in which the Framework or the current approach to its implementation may need to be adapted to take direct account of these changes. In our terms of reference, we

were specifically invited to reflect on certain contextual matters and changes which might need to be considered in this first revision of the NPF. The first of these relates to the environment, including climate transition.

16. The Group recognises the increased and urgent need to address **Climate and Environmental challenges**, driven by EU policies and global commitments, such as the Paris Agreement and the European Green Deal, and as reflected in Irish policy including the Climate Action Plan 2023, and Ireland's sectoral emission targets. It agreed that the increased focus on environmental values reinforce the emphasis on compact development and coordinated planning of infrastructure in the existing NPF and point to the need to ensure that there is an alignment between the Framework and all other related policy documents.
17. The Group also recognises that, in the context of Ireland's Climate and Environmental ambitions, Ireland's natural environment not only has an intrinsic value but is also a key strategic asset for the country. Environmental Protection Agency Reports (e.g., State of the Environment Report, SOER 2020<sup>3</sup>) have highlighted that the overall quality of Ireland's environment is not what it should be, and the outlook is not optimistic unless we accelerate the implementation of solutions across all sectors and society. Ireland's environmental challenges cut across different environmental topics, such as climate, air, soil, water, biodiversity and waste, and across organisations and sectors, business and all levels of society. In specific reference to the NPF, it is noted that Ireland's green and blue spaces, which include urban parks, coasts, lakes, rivers, forest and bogs, also contribute to our overall health and wellbeing.
18. The second set of related factors we were asked to consider were **competitiveness, investment, and prioritisation**. While Ireland has made some progress in recent years, delays in the financing, planning and delivery of key infrastructures have negatively affected our competitiveness over the past decade, and the benefits of greater sustainability in how we live and work will be key to competitiveness in the future. By providing greater clarity on how we are developing more sustainable physical infrastructure, both within and across locations, the NPF has the potential to enhance certainty in the environment faced by businesses which have to compete in markets, both national and international.
19. Integrated planning in relation to the location of housing and associated social facilities and other services are also recognised as being important for competitiveness. This in turn enhances the returns on both public and private investment. The Group is aware that the current pressures on the economy, due to labour market shortages, mean that public investment in infrastructure, including

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<sup>3</sup> Environmental Protection Agency (2020): *Ireland's Environment. An integrated assessment*. EPA. Wexford.

housing, needs to be strategically prioritised and sequenced. This should be done carefully and fully in line with the NPF, making sure that none of the key NPF principles are sidestepped for reasons of stated 'urgency'. To deliver this will require strong coordination at whole of government level.

20. The exceptional rate of growth of the Irish population in a European context have been much discussed in recent years, and particularly following the release of the preliminary census results for 2022. In relation to **overall demographics**, the trends towards an older population, an increase in single person households and continuing net immigration are well recognised. Most of the discussion in policy documents on the ageing population over the past decade has centred on the related economic factors, such as pension costs and dependency ratios, and requirements for social services, and particularly health care. See, for example, the National Risk Assessment, 2023.<sup>4</sup> There has been much less public 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.
21. The Group sees it as being inevitable that demographic change will be a key issue for the revision and will be facilitated by the release of more detailed results from the 2022 census due later this year and into next year. The Group believes that a particular emphasis is needed on addressing the sources of population growth, and particularly the significant growth in the share of the population accounted for by older people, by people living alone, and by newcomers to Ireland. Given its long-term focus, this revision of the NPF might consider a very wide range of scenarios in relation to possible greater increases in population.
22. Another area of change which has accelerated in the period since the NPF was being developed is **digitalisation**. Not only has there been phenomenal growth internationally, but strategies to drive digital adoption have come to centre stage in growth policies across the EU. As a country with a major ICT sector, and a highly dispersed population, the implications of these developments are very significant for Ireland, and they are reinforced by the new emphasis of the European Commission on reducing regional disparities. The Group believes that the revision should explore how national policies regarding digitalisation will intersect with the NPF, and especially how these developments can reinforce some of the key principles in the NPF, such as increasing the relative growth of employment in the metropolitan centres outside of Dublin and in larger towns.

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<sup>4</sup> *National Risk Assessment 2023 - Overview of Strategic Risks* Government of Ireland, July 2023.



23. There may be potential for exploring whether and how policy interventions might be delivered spatially to strengthen urban areas, and address digital exclusion, an issue of focus in the current National Risk Assessment. It is not yet clear what will be the long-term implications of changes in work, retail and commuting patterns, associated with digitalisation and the increased use of hybrid working patterns following Covid 19. Nonetheless, the revision could usefully tease out the direction of travel associated with these evolving changes and explore which principles in the Framework might be developed further to address them.
24. Our terms of reference also requested that we look at **regional development**, which is a key outcomes indicator of whether our planning framework is working well. Again, five years is early in the life of the NPF, but the policy emphasis on better regional balance is not new in Ireland and goes back to the foundation of the state. Key to achieving this is the development of the metropolitan cities outside of Dublin (see Section 3) and the associated dynamics in city-regions. These in turn depend on sustainable clusters of economic activities which generate strong regional labour markets. The Group notes the importance of monitoring these developments and suggests that it would be desirable that the relevant state bodies and agencies (e.g., IDA, HEA) would report annually on the regional dimensions of their activities to inform progress.

## Section 3: Spatial Coherence

25. For spatial planning to be genuinely effective at the national scale, the strategic role of all settlements and places - and the relationships between them – should be well understood and articulated. Although this is especially important for the metropolitan cities and the city-regions in which they sit, this kind of spatial coherence should extend to networks of places right across the country encompassing smaller settlements, rural locations, natural regions and achieving greater spatial coherence on the island of Ireland. There is scope for these principles – already well embedded in the NPF – to be strengthened significantly as the revision proceeds. This section considers how this might be done for metropolitan cities, compact growth, housing patterns in rural areas, large-scale infrastructure, and a select group of other spatial planning issues.

### 3.1 Metropolitan cities

26. The NPF has begun the process of bedding in a significant urban vision for Ireland. The spatial integrity of the Greater Dublin Area helps to confirm its status as a capital city-

region of international importance, and similarly Metropolitan Cork is also an established spatial entity that sits comfortably within its tier of European Second Cities. Although there are positive signs of recent progress – especially at the project level – the cities of Waterford, Limerick and Galway have yet to assert a strong metropolitan identity at this scale. For all cities, where conflicts arise, care must be taken to ensure that local authorities prioritise metropolitan objectives, in recognition of their strategic national importance. Therefore, the crucial role of Metropolitan Area Strategic Plans in bringing forward NPF priorities cannot be over-stressed; not just in terms of providing a balance between Dublin and the other cities but in ensuring that all our cities live up to their international potential.

***Recommendation 1:*** *The revision of the NPF should explore ways of making the five Metropolitan Area Strategic Plans more effective. This is key to ensuring that all Irish city-regions live up to their potential as European cities of scale.*

### **3.2 Compact growth: preventing further sprawl**

27. A useful step forward in the containment of urban sprawl in Ireland has been the NPF targets of delivering between 30% and 50% of new homes within the ‘existing built-up footprints’ of the five cities and other settlements. However, these current targets will not deliver compact growth, because even if these objectives can be met (and evidence about this is still unclear), they allow between 50% and 70% of all new homes to continue to be built at greenfield locations (i.e., beyond the edges of settlements). In effect, this means that unsustainable greenfield development at this scale across the country in the years ahead could be said to be consistent with the current targets in the NPF. At least in theory, and likely in practice, this allows county and city development plans (and individual project approval decisions) to depart from national ‘compact growth’ principles at a significant scale. It is felt that particular attention should also be paid to reporting and monitoring on progress with this specific issue. Because this kind of greenfield growth can often be inefficient, low density and difficult to serve by public transport and infrastructure, the implications for urban sprawl are worrying. In effect the current targets are insufficiently ambitious.
28. This situation is made worse by the current definition of ‘existing built-up footprints’. At present, these are linked to CSO mapping boundaries that encompass substantial amounts of undeveloped greenfield land in and around the edges of cities and towns which – in the Metropolitan areas especially – currently fulfil important green belt functions<sup>5</sup>. It is important to the success of the NPF that the very real pressures that

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<sup>5</sup> Where large amounts of undeveloped land at the edge of cities and towns (‘green belt’ land) are seen simply as ‘development-land-in-waiting’, valuable opportunities to prevent settlements from merging into one

exist for decisions to depart from high-level NPF principles (e.g., the zoning of green field land the granting of planning permission for homes or workplaces lying outside of established settlements, etc) are guarded against.

***Recommendation 2:*** *The revision of the NPF should critically review the current targets and consider stronger and more ambitious targets for compact growth.*

### **3.3 Housing patterns in rural areas**

29. When it comes to the development of rural areas, the NPF objectives (and the Regional Spatial and Economic Strategies (RSEs) and County and City Development plans (CDPs) that flow from them) aspire to make it attractive for people to live in towns and villages. Whilst design guidance, public realm improvements and community projects may all help to bring forward some housing in rural villages, the continued pattern of scattered, individual dwellings across the countryside remains a challenging sustainable development issue for rural areas.

30. While difficulties associated with such unplanned growth – particularly rural homes that are urban-generated - have been well understood since the 1970s, a significant majority of new homes continues to be located outside serviced rural settlements. This case-by-case laissez-faire approach is problematic on many levels, including the lack of measurable indicators of progress, the inequity around how some individuals can get planning permission by demonstrating a local need or local connection while some individuals cannot, and the cumulative effect of thousands of new dwellings each year requiring land servicing and relying almost exclusively on private car use. Whilst it is accepted that this is politically difficult, failure to address the issue directly in the NPF appears to be inconsistent with the high-level goals of the framework.

***Recommendation 3:*** *The revision of the NPF should consider the inherent unsustainability of scattered, uncoordinated patterns of new houses in the countryside and explore how to develop a new national strategic objective to direct new rural housing towards rural towns and villages and to restrict new urban-generated rural housing elsewhere.*

### **3.4 Large-scale infrastructure projects**

31. Among the most difficult spatial planning challenges that Ireland faces in the coming years is how we respond to the level of change linked to large-scale infrastructure

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another and to achieve compact growth can be missed. Some strategic interventions in green belt areas can be appropriate but these should be masterplan-led and deliberate rather than ad hoc.

projects. An example of this is the further deployment of onshore renewable energy projects at the scale required to meet our climate commitments. Greater clarity at the national level will be key to reducing conflicts at the level of the individual project.

32. The Group is also aware that a National Land Use review is underway, which will seek to optimise land use across key objectives such as improving socioeconomic, climate, biodiversity, water and air quality outcomes. Along with this, a parallel challenge for national spatial planning is to quantify the scale of actual physical change that is envisaged at a national scale and to make some strategic decisions about how this is apportioned to the different counties and / or natural regions.

***Recommendation 4:*** *The revision of the NPF should seek to name the principles for identifying priority locations for the deployment of infrastructure at a strategic scale across the country.*

### **3.5 Other spatial planning challenges**

33. **Spatial planning in ‘soft spaces’<sup>6</sup>:** Experience has shown that some significant spatial planning issues can manifest themselves in places that do not sit easily within formal administrative boundaries or at the various scales outlined in the NPF. One such example is the degree to which some parts of the country may be disadvantaged because of remoteness and peripherality. Other examples include coastal zones, Gaeltacht areas, river basins, upland areas, and offshore islands all of which experience very specific (and often quite complex) planning issues from time to time. Measures that address these in focused ways (e.g. along the lines of ‘priority area plans’ and ‘joint area plans’<sup>7</sup>) could become very important for achieving overall spatial balance in Ireland.

34. **Proofing for Spatial Equity:** The complex and uneven nature of society – particularly in terms of advantage and disadvantage – can often be reflected in spatial terms. This unevenness can occur not just in housing but also in relation to the availability of services, access to all levels of education, recreational amenities, jobs, and opportunities for personal development. If the planning system can ensure that strategic decisions (including zoning and large-scale project approvals) are not made at the expense of places with greater needs, then it should be possible to achieve better spatial balance.

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<sup>6</sup> See for example *The new spatial planning; territorial management with soft spaces and fuzzy boundaries* (2010) by G. Haughton, P. Allmendinger, D. Counsell and G. Vigar. Routledge.

<sup>7</sup> The setting up of these new planning instruments is included in Chapter 6 the draft *Planning and Development Bill 2022*. However, as currently configured they apply only to urban areas.

35. **Employment locations:** For spatial planning, another challenge is to ensure that the locational requirements of different kinds of workplace and different kinds of economic activity are well understood and addressed effectively. In particular, locations for shopping, office-based based industry, and institutions with large workforces should be closely linked to the principles of transport-oriented development, brownfield development, the regeneration of city and towns centres and the 15-minute city.

***Recommendation 5:*** *The revision of the NPF should explore ways of recognising the specific planning challenges that can occur within natural, geographical or transboundary sub-regions and of embedding this broader range of spatial entities within the scope of spatial planning.*

***Recommendation 6:*** *The revision of the NPF should consider ways in which the concept of Spatial Equity proofing could be brought forward for strategic planning in Ireland.*

***Recommendation 7:*** *The revision of the NPF should consider principles that would strengthen the link between the locations of new workplaces with its compact growth objectives.*

## **Section 4: Implementation, Monitoring and Governance**

36. It is recognised by the Group that the adoption of the National Planning Framework is a significant development in national spatial planning in Ireland, following on previous National Planning document that were either not adopted (Buchanan 1968), abandoned (IDA Regional Industrial Plans 1973), or failed to be properly implemented (National Spatial Strategy 2002). It is also recognised by the Group that the NPF is designed to provide a broad vision for shaping future growth and development across Ireland out to 2040, and that it is only at very early stages of implementation. While it should not be seen as a stand-alone 'project', it is vital that its implementation is assessed and monitored so that Ireland can provide a sustainable place for its people to live and work.
37. The Group believes that although there is a good level of overall support for the NPF, there is less clarity on the support for the implementation of the NPF and commitment to its metrics of success. A key challenge for the NPF is implementation, rather than policy overall, and the interventions for implementation and delivery. Provisions for annual monitoring of the NPF at both a national and regional level are then crucial.

38. Monitoring should be comprehensive and incorporate outcome metrics, such as the percentage of population and employment growth in the five existing cities and their suburbs, and progress indicators such as trends in planning and zoning decisions across the country.
39. Clearly the investment through the NDP on priorities identified in the NPF, and the alignment of the NDP and the NPF is very positive. However, the 'impact' of the NPF to date, including progress on the National Strategic Outcomes and National Policy Objectives, is not clear. This lack of clarity in turn can impact on the relevance of the NPF to national and regional decision makers, and to the apparent relevance of the NPF to communities and businesses. Clearer articulation of National Strategic Outcomes and National Policy Objectives would also support the OPR in the fulfilment of its statutory oversight functions.

***Recommendation 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.*

***Recommendation 9:*** *The revision of the NPF should consider the establishment of a dedicated unit which would monitor implementation of the NPF annually. The unit should be mandated to require all relevant Departments and relevant organisations (e.g., Local Authorities and Uisce Éireann) to report progress and report publicly on their performance against clear metrics, both investment (including the NDP) and impact metrics. The monitoring unit should also identify challenges in the implementation process.*

40. With regard to Governance, organisations recognise at a philosophical level the need for more balanced regional development but do not appear to be engaged proactively in addressing the challenges and tensions that arise in the translation of that aspiration into application at ground level; for example, should there be a focus on supporting regional growth and restricting growth in Dublin or should the focus be on more specific spatial targets? In addition, as noted above, there can be trade-offs between economic, environmental and social objectives. Such tensions and trade-offs need to be recognised and addressed by those organisations involved in the implementation of the NPF.
41. While much of the narrative relating to the Planning system in Ireland has tended to focus on individual planning decisions, the Planning system is much broader than this, encompassing, for example, EU legislation as well as National Policy, Guidance and Legislation. The intention is that the NPF frames policy at a national level and then can drive and support plans and strategies including Regional Spatial and Economic Strategies (RSES), City and County Development Plans (CDPs) and Metropolitan Area

Strategic Plans (MASPs) - all intended to be nested together under the guidance of the NPF.

42. It is clear to the Group that the CDPs are key in assessing planning applications and traditionally in Ireland the focus has been on individual planning applications and their link to the CDP. The NPF is influential to the extent that its priorities are embedded in the CDPs. It is critical, therefore, that there is a strong alignment between the NPF and CDPs to drive national policies at a regional and local level.
43. The OPR function is to evaluate, assess, and report on whether CDPs are consistent with the NPF and whether the NPF policies and targets are applied consistently at city or county level. It is recognised that the Office of the Planning Regulator has only been established since 2019 and so the institutionalisation of this oversight role is still at an early stage and needs to continue to develop.
44. It is also noted that whilst Metropolitan Area Strategic Plans are key to NPF success and to translating national policy to the regional level, experience to date on delivery appears weak. While intended to play a role between National and city / county in the planning hierarchy, Regional Assemblies are heavily embedded in Local Authority structures, and it is recognised that there can be tensions between these local and regional roles.
45. Whilst there have been several significant developments which are now in place in the planning system which should support the delivery of the NPF, the Group believes that successful implementation requires a broad coalition of actors working together, each with clear roles and mandates.

***Recommendation 10:*** *The revision of the NPF should consider clarification of the roles of all key National, Regional and Local Bodies to support the implementation of the NPF and to ensure alignment between the NPF and National, Regional and Local Plans, including County Development Plans.*

## **Section 5: Coordination, Consultation and Advocacy**

46. The current National Planning Framework provides an opportunity for Ireland to embed the importance of Place in all relevant areas of our policy making and decisions, reflecting its importance in all our lives. In effect, what is built today will impact on how people will live for many decades to come. What is crucial is that the approach to planning in the NPF, and particularly regional balance and clustered and compact development, is built into the decision-making frameworks of all relevant policy areas, particularly in relation to infrastructural investments. Furthermore, how services are

organised spatially – for example, in health and education – should be aligned with the objectives of the NPF.

47. This alignment requires a much greater commitment to joined up policy making than has been the case hitherto – a commitment and a follow through by all Departments and Agencies, which cascades down to local government. It is the responsibility of local authorities to embed the NPF into their City and County Development Plans and to localise this in a way that is consistent with the NPF. And as noted above, from time to time this will involve difficult trade-offs which should be acknowledged and dealt with transparently.
48. The Group is aware of the role of the National Investment Office (NIO) which is charged with the implementation of the NDP. Given the scale of urgent infrastructure challenges faced by the country, we see a need for strong coordination of all key strategic planning decisions, including those being funded under the NDP.
49. In its discussions, the Group noted a need for a more collective ‘buy in’ to the importance of spatial planning to the delivery of social, economic and environmental objectives. This ‘buy in’ needs to be echoed throughout the public sector, including the civil service, local authorities, and agencies whose work impacts on the locations of enterprises and the delivery of local services. The link between the NPF and the NDP provides one channel for this to develop, but other channels are needed if we are to ensure more spatially coherent development.
50. The Group sees real value in having a greater appreciation of the benefits of good spatial planning develop at local level. This would mean that as individual proposals are generated, there is a better understanding of whether and how these do/do not fit in to the implementation of an overall vision for the local area or region. It would also assist in establishing the context in which these proposals can be assessed. This could, for example, help demonstrate why additional housing could allow local communities to grow in a way that supports connections across families and friendships and could reduce tendencies towards nimbyism. And it would increase the understanding of how the location of businesses can best serve those who work in them and those who are serviced by them.
51. This understanding is particularly needed as the population expands and changes in its age structure, and as we address seriously the decisions that must be made to achieve our environmental and climate targets. While in many locations there is significant cross-community engagement in projects that strengthen the physical environment that is shared, if this were to increase, it would enhance the dynamism that would be released as we plan for a better future.



52. Ireland is far behind where it needs to be in meeting its environmental obligations and ambitions, which is an important issue for Government as climate issues come more to the fore. Furthermore, any delays in addressing these obligations create burdens of uncertainty for households and enterprises and stymie decision making.
53. Consequently, the Group sees merit in greater investment in advocacy to generate a wider understanding of the potential of good spatial planning to benefit the common good. This would follow developments in the environmental area over many years, where people have increasingly come to understand the importance of both local and global environmental considerations. This would require clearer rules, supports and incentives at local, regional and national level, and stronger and more widely based advocacy of the benefits to society of spatial planning within public bodies.
54. To enhance a greater understanding of spatial planning for the public good, the Group sees merit in a public conversation of how such planning can address societal need and betterment and not only individual interests. This would mean recognising openly that, with better and more coordinated planning than in past times, our current spatial environment would be more sustainable and inclusive. Put another way, as a country we have not paid adequate attention to the costs of poor planning in the past – the school that is not readily accessible, the shopping centre that makes motorised transport necessary, the housing estate that lies outside the town where opportunities for closer locations could have been taken, and so on.
55. The Group also sees merit in having more publicly-funded research on how better spatial planning can create more sustainable development across cities, towns and villages – such research would help inform public discussion and would support analysis of the progress of implementation in the years ahead.
56. The Group also sees value in exploring how education curricula can be revised to incorporate an understanding among today's school-goers of how, with better planning, it will be possible to live better lives. There is also an argument that a critical understanding of spatial planning principles should be incorporated into the educational formation of a wide range of early career professionals across diverse disciplines at third level.

***Recommendation 11:*** *The revision of the NPF should consider the benefits of establishing a cross-departmental implementation group at the centre of government which would systematically prioritise and co-ordinate decisions in relation to all key infrastructure decisions, including the NDP projects and programmes.*

***Recommendation 12:*** *The revision of the NPF should consider whether a Spatial Planning Council, with a membership from relevant professions and academic*

*institutions, should be established to bring information to civic society that would broaden our understanding of the societal benefits of better national spatial planning in Ireland. Consideration should also be given to whether a consultative forum could contribute to this process by starting a national conversation on national spatial planning.*

***Recommendation 13:*** *The revision of the NPF should consider how the very strong enthusiasm for planning and sustainable development that is found in local community groups, businesses, civil society, and development bodies across the country might be supported and harnessed. This would help and to foster inclusive dialogue about strategic planning initiatives at all spatial scales.*

## **6: Concluding Comments**

57. The National Planning Framework articulates some very strong and enduring spatial planning ideas for Ireland. Chief among these is its focus on the five cities and a clear emphasis on acting at the metropolitan scale. Prior to this, successful sub-regional planning depended for the most part on local voluntary coalitions of actors with a common cross boundary vision for growth and development. By providing a statutory and policy basis for this to be established around all our major urban centres, the NPF has real potential to be a powerful guiding instrument for sustainable growth, investment and development, to ensure the wellbeing of future generations. Along with a set of complementary objectives for diverse rural places, for the marine and for environmental sustainability, the NPF sets out a clear vision for what good planning should look like. In addition, the NPF has a more focused and strategic approach than its predecessor (the National Spatial Strategy) and it is very well aligned to the funding and infrastructure priorities of the National Development Plan.
58. The NPF also includes aspirational language around achieving well-designed places, healthy cities, access to facilities, quality of life for all, transport choice and protection of environmental assets. These general concepts – especially where they influence new ways of thinking about sustainable development – can be very powerful in terms of achieving buy-in and for building momentum towards delivery.
59. To be genuinely strategic and influential, the NPF should have scope to challenge the *status quo* performance of the main actors when required. Also, conformance with the framework should not be accidental; it should be conscious and deliberate. Conversely, when inevitable departures occur, there should be clear evidence that the NPF – rather than being set aside – is invoked in such a way that it influences the discussion around the decision to be made.

60. Even when there is widespread acceptance of sustainable and inclusive development and its underlying principles, it is not always easy to reconcile sustainable economic growth, environmental protection and social progress. For spatial planning, getting this balance right to benefit the common good requires a continuous effort that usually involves making difficult choices. And there is no doubt that this can be challenging at times.
61. There is merit in a strengthened NPF playing a very powerful role by framing these choices within a clear national vision and ensuring consistency and co-ordination in the development of our cities, towns and rural places over the coming decades.

# APPENDIX: Terms of Reference and Process of Preparing this Report

## A. Terms of Reference provided to the Expert Group

### 1. Context

The National Planning Framework (NPF) is the long-term, 20-year strategy for the spatial development of Ireland to promote a better quality of life for all, with sustainable economic growth and an environment of the highest quality as its key underlying principles. The NPF influences regional strategies and city/county development plans as it is the central planning policy document for the Country and accordingly, serves to guide future development and investment decisions.

Government is now undertaking the first revision to the National Planning Framework, in accordance with the Planning and Development Act, 2000 (as amended), which provides the legislative basis for the NPF. Specifically, section 20C (5) states the following:

*Every 6 years after the date of publication of the National Planning Framework, the Government shall either—*

- a) revise the Framework or replace it with a new one, or*
- b) publish a statement explaining why the Government has decided not to revise the Framework and include in the statement an indication of a date by which it will be revised, or a new National Planning Framework will be published.*

### 2. Purpose

As part of the initial stage of the revision, an Expert Group has been convened and are requested to:

Undertake a high-level review of the existing National Planning Framework to inform the scope of the first revision of the Framework, looking ahead from Ireland in 2023.

Further to the provisions of Section 20C (2) of the Act which sets out the matters that the revision shall address, the Group may wish to consider a number of relevant issues, including, but not limited to, the following:

- The existing adopted strategy approach.
- The implementation of the NPF to date at national, regional and local level.
- The changing policy context as it relates to national planning policy, with consideration to be given to the following:
  - Climate Transition
  - Competitiveness
  - Regional Development
  - Demographic Change
  - The Impact of Digitalisation
  - Investment and Prioritisation
  - The identification of priority matters to be addressed as part of the first revision.

- Any other matters, which the Group consider relevant.

### 3. **Output**

The output of the Group's considerations and recommendations will take the form of a report for the Minister's consideration, intended to be completed by end of June 2023. The report of the group may form part of a submission to Government. The Group's report will also inform the NPF Issues Paper.

### 4. **Membership**

The Members of the Group are:

- Laura Burke, Director General of the Environmental Protection Agency.
- Brendan O'Sullivan, Director of the UCC Centre for Planning Education & Research.
- Frances Ruane, Chair of the National Competitiveness and Productivity Council.

### 5. **Operations of the Group**

- The Group may wish to nominate a chair.
- The Secretariat to the Group and the related supports to the Expert Group will be provided by the Planning Division of the Department of Housing, Local Government and Heritage, in order to assist in the delivery of required outputs.
- The Group may seek to engage with specialist or expert individuals or bodies/agencies to inform the work of the group and where identified, this will be facilitated by the Department.
- Noting the strictly time-limited and high-level focus of its activities, it is anticipated the Group will convene for three meetings with scope for additional meetings required.
- The work of the Group will cease, on submission of its report to the Minister.

### 6. **Timelines**

The preliminary schedule for the first revision of the NPF is set out as follows:

- I. **Pre-Draft Stage (February 2023 – July 2023)**
  - Establishment of the Expert Group to undertake high-level review
  - Publication of the Roadmap
  - Preparation of the Issues Paper for stakeholder consultation.
- II. **Development Stage (July 2023 – October 2023)**
- III. **Draft Stage (November 2023 – January 2024)**
  - Publication of the draft NPF revision and accompanying technical assessments
  - Public Consultation
- IV. **Amendment Stage (February 2024)**
- V. **Final Stage (March 2024)**
  - Approval of document and publication

## **B. Process of Preparing the Report**

The Expert Group was tasked with preparing a report for the Minister's consideration, which would set out a strategic high-level view on the matters set out in the Terms of Reference and provide recommendations for the Revision Process. Support to the Group was provided by the Department of Housing, Local Government and Heritage.

The membership of this independent Expert Group was confirmed by letter from Minister O'Brien on 9 March 2023. Following their appointment, the members had an online introductory meeting with Department officials on 30 March 2023, and attended an in-person information day organised by the Department on the 13 April 2023 to brief the Group on the National Planning Framework, including context and implementation to date. The Information Day began with a meeting with the Minister for Local Government and Planning, Kieran O'Donnell TD, who outlined the expectations of the Dept in relation to the work of the Group. This was followed by a briefing from members of the Planning Section in the Department of Housing on the NPF and how it was operating. Following that briefing, there were presentations from (i) the OECD, (ii) the ESRI, (iii) the Department of Public Expenditure, National Development Plan Delivery and Reform (DPENDR), and (iv) the Department of Environment, Climate and Communications (DECC) in relation to the current operation of the NPF and the changing economic, social and environmental context.

The Expert Group was aware that the major review process ahead would involve wide stakeholder engagement as part of its process. Nonetheless, the Group did meet representatives from a small number of key organisations (see below) whose work is seen as being particularly relevant to the NPF and its implementation.

The Expert Group members met online on 16 May 2023 to discuss their progress and engagement to date, raise questions in respect of the NPF in general for the Department, and to determine the agendas for their upcoming meetings with representatives of stakeholder groups they decided they wished to meet. Department officials provided administrative support for the Group in organising these meetings, which took place in June 2023:

**1 June 2023:** Meetings with representatives from (i). County and City Management Association; (ii). Office of the Planning Regulator; (iii). Members of the Regional Assemblies

**26 June 2023:** Meetings with representatives from (i) Chambers Ireland, (ii) An Bord Pleanála

**28 June 2023:** Meetings with representatives from (i) The Irish Strategic Innovation Fund, (ii) IDA Ireland and Enterprise Ireland

The Group began its work of drafting the report in early July. It carried out its work by meeting virtually on a weekly basis throughout July and it completed the report in mid-August 2023.