



Rialtas na hÉireann  
Government of Ireland

# Issues Paper

## First Revision to the National Planning Framework

**October 2023**

Prepared by the Department of  
Housing, Local Government and Heritage  
[gov.ie](https://www.gov.ie)

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## Minister's Foreword



Since the National Planning Framework (NPF) was published over five years ago, our society has experienced considerable change, some of which has been unprecedented. The first revision to the NPF presents a valuable opportunity to consider some of the implications of those changes, including our growing and changing population as well as the impacts of Covid-19, particularly in relation to how we live, work and do business.

Government made the decision to commence the process of revising the NPF in June 2023, which was accompanied by the publication of a [Roadmap](#). Determining the scope of the revision is an important exercise and one, which must be guided and informed by a strong evidence base. The publication of Census 2022 results, in particular, allows for the most up-to-date demographic information to be analysed and reviewed as part of this revision.

In my role as Minister, I am aware of the value of sourcing independent expertise to support the work of Government and in that regard, I appointed an Expert Group to undertake a high-level review of NPF implementation to date to inform this revision process. The [Report of the Expert Group](#) was published in September 2023 and has provided valuable insight into how the NPF is currently viewed and implemented. The recommendations of the Expert Group have been considered in the preparation of this Issues Paper.

Stakeholder engagement remains one of the cornerstones of the planning system in Ireland and it is now time to take stock of the implementation of the NPF and to consider the significant and critical developments in relation to planning policy, guidance and legislation, as well as governance and institutional change that have taken place since 2018. While the NPF has only entered year six of a twenty-year

strategy, this Issues Paper provides an important guide in considering what potential change to the Framework might look like, taking into account future population and housing requirements, infrastructural priorities, environmental considerations, co-ordination with marine planning and the promotion of sustainable settlement patterns and transportation.

Views of key stakeholders on the Issues Paper will therefore play an important role in developing the Draft Revised NPF Strategy for public consultation with the associated environmental assessments towards the end of the year, ahead of adoption of the revised Framework in 2024.

**Darragh O'Brien TD**

**Minister for Housing, Local Government and Heritage**

## Minister of State's Foreword



I warmly welcome the publication of this Issues Paper on the revision to the NPF, which has been prepared to encourage discussion and inform stakeholders on the main changes that have occurred since 2018 and pose the questions that now need to be considered.

Meeting the changing needs of our society and communities in a sustainable manner is more important than ever, particularly when we consider challenges such as climate transition and our growing and changing population. At this stage in the life of the Framework, it is also important to acknowledge the implementation of the NPF at a regional and local level with the adoption of our three Regional Economic and Spatial Strategies and the review of all City and County development plans almost completed. Having an established hierarchy of national, regional and local planning policy provides the foundations for delivering effective and collaborative plan-led outcomes for communities.

As Chair of the Planning Advisory Forum, I look forward to considering the views of key stakeholders on the Issues Paper and to continued engagement as part of this first revision.

**Kieran O'Donnell TD**

**Minister of State for Local Government and Planning**

# 1 Purpose of this Issues Paper

It has been five years since the [National Planning Framework](#) (NPF), replaced the National Spatial Strategy as the overall spatial planning and development strategy for Ireland. The NPF, together with the [National Development Plan](#) (NDP) 2021, combine to form Project Ireland 2040 the overarching policy and planning framework for the social, economic and cultural development of Ireland.

The NPF is a national strategy which provides a clear vision to guide future development and investment decisions and is critical in co-ordinating the all-of-Government approach to spatial development, which:

- enables strategic choices to be made about place and investment;
- prioritises decision-making to influence change;
- enables greater detail at the appropriate spatial and/or sectoral levels.

The importance of the NPF in establishing a broad national plan for strategic planning and sustainable development of urban and rural areas to secure balanced regional development and co-ordination of plans at regional and local level is recognised and provided for in legislation<sup>1</sup>.

The NPF was published in 2018 and has since significantly influenced both the evolution of planning policy at national, regional and local levels, and development patterns and trends across the country.

The Planning and Development Act 2000 (as amended) requires the Government to either revise, replace or state why the Government has decided not to revise, every 6 years after the publication of the NPF. Section 20C (5) specifically states that:

*“every 6 years after the date of publication of the National Planning Framework, the Government shall either –*

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<sup>1</sup> [The Planning and Development Act 2000, as amended](#)

- 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”.*

The Government decided in June 2023 to undertake a revision to the NPF, in recognition of the need to account for particular changes which have taken place since 2018 which require consideration in the context of potential amendments to the current Framework.

This Issues Paper is a stakeholder consultation document that provides the basis for detailed examination of the main issues to be considered as part of the first revision to the NPF.

There are two significant outputs that have been taken account of in the preparation of this paper:

- The publication of final [Census 2022 Results](#).
- The completion and publication of the [Report of the Expert Group](#).



## 2 Context for the First Revision

The NPF strategy is at an early stage of implementation, currently in the sixth year of a twenty year strategy. Consequently, the scope of this revision to the framework will need to be defined and targeted. Matters to be addressed as part of the revision are set out in section 20C(2) of the Act and pertain to the identification of nationally strategic developments that have occurred since the last NPF was published in 2018. Specifically this revision has focused on taking into account future population and employment requirements, infrastructural priorities, environmental conservation, co-ordination with marine planning and the promotion of sustainable settlement and transportation regarding climate change.

In addition, there may be other thematic areas to be considered for the revision, which will continue to be explored through consultation with stakeholder groups.

### 2.1 Programme for Government

There is a Programme for Government (PfG) commitment to the statutory mandate to update the NPF in 2024. The PfG highlights that the NPF recognises the **'crucial importance of balanced regional development, clustered and compact growth, and improved connectivity to deliver economic prosperity and environmental sustainability'**.

### 2.2 Decision of Government

A decision by Government was made on 20 June 2023 to proceed with undertaking a revision to the National Planning Framework (NPF), as provided for in the Planning and Development Act, 2000 and publish the Roadmap<sup>2</sup> for this First Revision, which outlines the process and timeline for the revision.

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<sup>2</sup> [A roadmap for the First Revision of the National Planning Framework, June 2023.](#)

### 3 Role and Influence of the NPF

#### 3.1 PI2040 – Strategy and Investment Combined

Project Ireland 2040, published in 2018, includes the National Planning Framework (NPF) and the National Development Plan, which provided, for the first time, a development strategy supported by investment. The NPF strategy promotes a planned approach to the sustainable development of Ireland, to be delivered through a robust hierarchy of national, regional and local level planning policy. The strategy also extends beyond the planning system however, in recognition of the need for a cross-sectoral and whole of Government approach which requires alignment of policy and delivery mechanisms in order to meet the needs of our society, including the economy and the environment.

The NPF and NDP have a shared set of ten ‘National Strategic Outcomes’ or NSOs which bind the two documents together and represent a single vision and set of goals for both documents. The NSOs are the cornerstones of the development strategy set out across the two documents.



## 3.2 Influence within the Planning System

The National Planning Framework is at the apex of strategic planning in Ireland and establishes the overall national planning policy strategy, with which other planning policy at the national level is aligned and with which regional and local planning policy must be consistent.

Regional Spatial and Economic Strategies (RSEs) of the three Regional Assemblies, the primary aim of which is to implement Project Ireland 2040 – the NPF, are made at the regional tier of Government and to support the achievement of effective regional development consistent with the objectives of the NPF.

Recognising that the same level or even type of growth cannot occur everywhere, the NPF strategy includes a degree of prioritisation. The overarching strategy to accommodate growth to 2040 can be summarised under three spatial headings as follows:-

- a) **Regional Balance:** Achieve more regionally balanced population growth, split roughly 50:50 between the Eastern and Midland Region, and the rest of the Country (i.e. the Southern Region and Northern and Western Region). The strategy will continue to see majority growth in the Eastern and Midlands area, but will also see substantial growth occurring in the Southern and Northern and Western Regions.
- b) **City and Regional Growth Drivers:** To underpin the transition towards greater regional balance, target 50% of projected population growth into the five cities of Dublin, Cork, Limerick, Galway and Waterford, with the balance of growth targeted throughout the remainder of the Country. The strategy supports the future growth of Dublin as Ireland's leading global city of scale. It also sets ambitious growth targets for the four cities of Cork, Limerick, Galway and Waterford, recognising their significant potential to become cities of scale and to act as drivers for regional growth. The NPF also designates the five regional centres of Athlone, Sligo, Letterkenny, Drogheda and Dundalk, to drive growth outside of the city regions and to improve cross border networks.

- c) **Compact Urban Growth:** Target 50% of new housing growth in the five cities within the existing built-up footprint, on infill or brownfield lands; and 30% of new housing growth in all other settlements, within the existing built-up footprint, on infill and brownfield lands. The strategy recognises a prevailing pattern where growth associated with cities and larger towns is happening at the edge of the settlement or in the hinterland around the urban settlement. This type of dispersed settlement is contributing to the decline of the central parts of cities and towns; creates a demand for carbon intensive private car travel; and accelerates environmental degradation through loss of farmland and biodiversity and impact on water quality. By comparison, a compact growth approach that reuses lands within the existing built up area will revitalise urban areas, offer improved access to services and amenities, better integration with existing infrastructure and public transport, more efficient use of land and supports the transition to lower carbon living.

Following the adoption of the NPF in 2018 and the subsequent adoption of Regional Spatial and Economic Strategies (RSES's) in 2019 and 2020, a process of reviewing city and county development plans to align with the NPF is nearing completion with most reviews completed in 2021 and 2022. This will comprise the first full alignment of an 'integrated hierarchy' of plans. This process, overseen by the Office of the Planning Regulator (OPR), ensures that statutory development plans are consistent with the development objectives of the NPF and will ensure that land use and investment decisions at a local level are aligned to the NPF strategy. In addition to the hierarchy of plans, a suite of statutory guidance documents have been published under Section 28 of the Planning and Development Act, in order to support the integration of the NPF strategy, including population and housing targets, at a local level.

An all-of-Government approach with sectoral buy-in and policy alignment are critical to ensuring a co-ordinated strategy for Ireland's growth and development at national,

regional and local levels.

### **3.3 Planning Policy Alignment**

The Office of the Planning Regulator (OPR) was established in April 2019 on foot of recommendations made by the Tribunal of Inquiry into Certain Planning Matters and Payments (the Mahon Tribunal). The role of the OPR is to ensure that local authorities and An Bord Pleanála support and implement Government planning policy. The OPR has statutory responsibility for independently assessing all statutory forward planning documents with a view to ensuring that the plan provides for the proper planning and sustainable development of the area concerned. This includes evaluating city and county development plans, local area plans and variations/amendments to these plans.

The NPF strategy was incorporated into the subsidiary, but more detailed Regional Spatial and Economic Strategies (RSEs) of the three Regional Assemblies in 2019/20. The subsequent review of each individual city and county development plan to align with the NPF and RSEs, thereby establishing a robust integrated hierarchy of statutory spatial plans, is largely complete.

### **3.4 Investment and Delivery**

Project Ireland 2040 (PI2040) includes the NPF, which sets the overarching spatial strategy for the twenty years to 2040, and the National Development Plan (NDP), which provides the supporting capital investment plan for the period 2021-2030. The Project Ireland 2040 (PI2040) Delivery Board was established in 2018 to assist in the implementation of the National Development Plan and the National Planning Framework.

Earlier in 2023, Government approved a package of significant actions aimed at enhancing project delivery for the [National Development Plan \(NDP\) including significant changes to reduce the administrative burden in delivering major capital projects](#). In May 2023, the Minister for Public Expenditure, NDP Delivery and Reform, Paschal Donohue reconstituted the PI2040 Delivery Board with a revised Terms of

Reference<sup>3</sup>. The membership of the new Board comprises Minister Paschal Donohoe (Chair); Secretary General, Department of Public Expenditure, NDP Delivery and Reform; Secretary General, Department of Housing, Local Government and Heritage; Secretary General, Department of Further and Higher Education, Research, Innovation and Science; along with five external members of the Board.

## 4 The Expert Group

An Expert Group comprising three independent experts with experience of spatial planning, economic and social development and environmental protection, was established in March 2023. The Expert Group was requested by the Minister for Housing, Local Government and Heritage, to provide a high-level overview of the NPF, published in 2018, and identify matters to be considered in the first statutory assessment of the NPF. Membership of the Group was as follows:

- Laura Burke, Director General of the Environmental Protection Agency (EPA).
- Brendan O'Sullivan, Director, University College Cork, Centre for Planning Education and Research.
- Professor Frances Ruane, Economist and Chair of the National Competitiveness and Productivity Council.

This Group was tasked with preparing a report for the Minister's consideration, and to set out a strategic high-level view on the following matters with an accompanying set of recommendations:

- 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 specific consideration to be given to the following:
  - Climate Transition – addressing sectoral emission targets and the Climate Action Plan 2023.

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<sup>3</sup> [gov.ie](https://www.gov.ie) - Minister Donohoe chairs Board which will oversee the delivery of vital public projects ([www.gov.ie](https://www.gov.ie))

- Regional Development – the reality of regional ambition and the challenge of transitioning from ‘business as usual’.
  - Changing and Diverse Demographics – planning for uncertainty.
  - Digitalisation –impacts on work, retail, commuting and regions.
  - Investment and Prioritisation - timing and delivery.
  - The identification of priority matters to be addressed as part of the first revision.
- Any other matters, which the Group considered relevant.

## 4.1 Recommendations of the Expert Group

The Expert Group submitted their report for the Minister’s consideration on 16<sup>th</sup> August 2023<sup>4</sup>.

In preparing their report, the Expert Group considered how the NPF is being implemented at national, regional, and local levels, and considered 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.

In undertaking and completing their report, the Expert Group also considered how well the NPF is being implemented at national, regional, and local levels, including how the implementation process is being managed and monitored. Specific issues highlighted in the report included:

- 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, or 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 improve alignment with policies to deliver the ambitions of the NPF, and through the provision of

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<sup>4</sup> [Report of Expert Group for the First Revision of the National Planning Framework](#), September 2023

additional resources to support greater efficiencies and more timely decision-making; and

- iii. whether there are adequate structures in place to ensure that other areas of Government 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.

From the Expert Group's engagement with relevant stakeholders, it was evident that there is widespread support for the NPF strategy, and the need for the long-term and principles-based approach it takes.

The Expert Group specifically 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.

Overall, the Expert Group summarises that the NPF revision should build on the NPF strategy and strengthen it in three broad respects:

1. Compact growth targets should be more ambitious and more clearly defined;
2. 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; and
3. 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.

The report lists 13 recommendations, which can be categorised generally under the following headings:

### **Settlement Strategy and Compact Growth**

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



**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.

**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.

### **Investment and Prioritisation**

**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.

**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.

### **Implementation and Monitoring**

**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.

**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.

**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.

### **Support Measures for National Spatial Planning**

**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.

### **Miscellaneous Recommendations**

**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.

These recommendations have informed the issues presented throughout this paper and shall continue to inform the revision process, particularly in relation to the draft revised NPF which will be placed on display for public consultation in Q4 2023.

## **5 Drivers for Change – the Strategic Policy Issues for the First Revision**

Based on the relatively early stage of implementation of the NPF as a long-term strategy, the potential areas for revision are related to the wider relevant changes that Ireland has experienced over the course of the last 5 years.

The accelerating climate crisis, in particular, provides the opportunity to identify how the NPF could further respond to, and support Ireland's transition to net zero in the years ahead.

External 'shocks' which have taken place such as the COVID-19 pandemic and the war in Ukraine have brought about unprecedented changes to our economy and society and have given rise to the need to take account of the long-standing impacts related to both events.

Furthermore, careful consideration will need to be given to the transition to the NPF strategy, particularly in relation to the core NPF policies, which are central to achieving the long term strategy vision for Ireland. For example, measuring the degree to which the NPF strategy is giving effect to balanced regional development as intended or how compact growth trends have emerged in our cities and towns are key questions for this first revision.

### **5.1 Climate Transition and our Environment**

#### **5.1.1 What Has Changed?**

Since the publication of the National Planning Framework (NPF) in 2018, the acceleration of the climate crisis has prompted an urgent response in the form of coordinated and targeted action.

Observations show that Ireland's climate is changing in terms of sea level rise, increases in average temperature, changes in precipitation patterns, and weather extremes.

Extreme weather events are becoming more prevalent with reports from the WMO and Intergovernmental Panel on Climate Change reinforcing the urgent need for greater

action on climate adaptation globally. All time record temperatures were observed in Europe during July 2023.

Climate transition is a cross-cutting policy area which impacts on the environment, society and economy. This revision presents the opportunity to build on the existing NPF climate policies to ensure that at a national level, national climate planning policy is appropriately ambitious to support delivering on Ireland's climate action targets.

### **Climate Transition in the existing National Planning Framework**

From a national policy perspective, the National Planning Framework (NPF) already provides a robust and established means to implement and integrate climate change objectives, including adaptation, at national, regional and local level and the transition to a low carbon and climate resilient society.

The NPF states clearly that "*in addition to legally binding targets agreed at EU level, it is a national objective for Ireland to transition to be a competitive low carbon, economy by the year 2050*".

There are a number of existing National Policy Objectives (NPOs) contained within the NPF, which include specific measures and approaches that relate to addressing climate change and the transition to net zero. These include:

- The delivery of compact growth and the promotion of sustainable development (paraphrased from National Strategic Outcome 1).
- Ensuring that Ireland's coastal resource is managed and implement adaption measures to address the effects of sea level changes, coastal flooding and erosion (NPO 41a and 41b).
- To support, within the context of the Offshore Renewable Energy Development Plan (OREDPA) and its successors, the progressive development of Ireland's offshore renewable energy potential, including domestic and international grid connectivity enhancements (NPO 42).
- Supporting the circular and bio economy (NPO 53).

- Reducing our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions (NPO 54).
- Promoting renewable energy use and generation at appropriate locations within the built and natural environment (NPO 55).
- Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding (NPO 57).
- Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), permeable surfacing and green roofs, to create safe places (NPO 57).
- Integrating planning for Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans (NPO 58).
- Enhancing the conservation status and improve the management of protected areas and protected species and conserve and enhance the rich qualities of natural and cultural heritage (NPO 59 and 60).
- Facilitating landscape protection, management and change (NPO 61).
- Improving air quality and helping to prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning.

The report of the Expert Group specifically acknowledged the role that the NPF strategy already plays in addressing climate change:

*“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*<sup>5</sup>.

The Expert Group's Report also highlighted that, in relation to the NPF "*...Ireland's green and blue spaces, which include urban parks, coasts, lakes, rivers, forest and bogs, also contribute to our overall health and wellbeing*". This indicates the value of our interactions with our physical environment as a force for good, further reaffirming the need to protect and manage these resources for future generations.

There have been a number of developments related to climate that this first revision will need to consider. However, one of the more significant is Ireland's commitment to a binding target to reduce greenhouse gas emissions by 51% and increase the share of electricity generated from renewable sources by up to 80% over the decade (2021 – 2030), and to achieving net-zero emissions no later than 2050<sup>6</sup>.

In order to meet these committed targets, the [Climate Action Plan 2023](#)<sup>7</sup> implements the carbon budgets and sectoral emissions ceilings-identifying actions. To achieving the targets, there is a need to align appropriate planning policy at a national level in order to inform regional and local level policy, plan making and decision making. It would appear that the revision will need to consider, in particular, the potential for improved integration of transport infrastructure and land use planning including accounting for the planned delivery of public transport infrastructure, and the accelerated provision of renewable energy infrastructure by way of on-shore and off-shore wind energy infrastructure, district heating and bio-methane development, amongst other considerations.

The Maritime Area Planning Act establishes a new planning system for Ireland's maritime area, underpinned by a statutory Marine Planning Policy Statement and guided by the National Marine Planning Framework. MARA will be a key enabler in

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<sup>5</sup> Pg 6, [Report of Expert Group for the First Revision of the National Planning Framework](#), September 2023

<sup>6</sup> Climate Action and Low Carbon Development (Amendment) Act 2021

<sup>7</sup>The Climate Action Plan 2024 is currently being prepared by the Department of Environment, Climate and Communications and as it is developed, will inform the draft revised National Planning Framework.

respect of Ireland’s ambitions for the Offshore Renewable Energy (ORE) sector. Ireland needs to respond to the climate targets set out in relation to renewable energy and in particular to onshore and offshore renewable energy development. The development and delivery of this new strategic infrastructure to the scale required will present challenges. Therefore, marine and terrestrial planning policies will need to be complementary and aligned to CAP23 in order to support the realisation of a zero-carbon economy as well as ensuring Ireland’s energy security.

## **5.1.2 Policy Issues**

### **Sectoral Emission Targets**

In order to ensure that Ireland is on track to achieve Net-Zero and a 51% reduction in Greenhouse Gases by 2050, a plan-led approach to supporting the objectives of the Climate Action Plan is required. The sectoral emissions ceilings, as approved by Government in July 2022, set out the reductions required to 2030 – see Table 5.1

The role of planning, and specifically national planning policy, is critical in underpinning the vision for the coordinated, sustainable development of Ireland’s villages, towns and cities as well as our rural areas.

EPA projections<sup>8</sup> indicate that Ireland will achieve a reduction of 29 per cent in Greenhouse Gas (GHG) emissions by 2030 compared to a target of 51 per cent and that reaching the 2030 target requires implementing policies that deliver emission reductions across all sectors in the short term.

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<sup>8</sup> Environmental Protection Agency, [Ireland's Greenhouse Gas Emissions Projections 2022-2040](#), June 2023



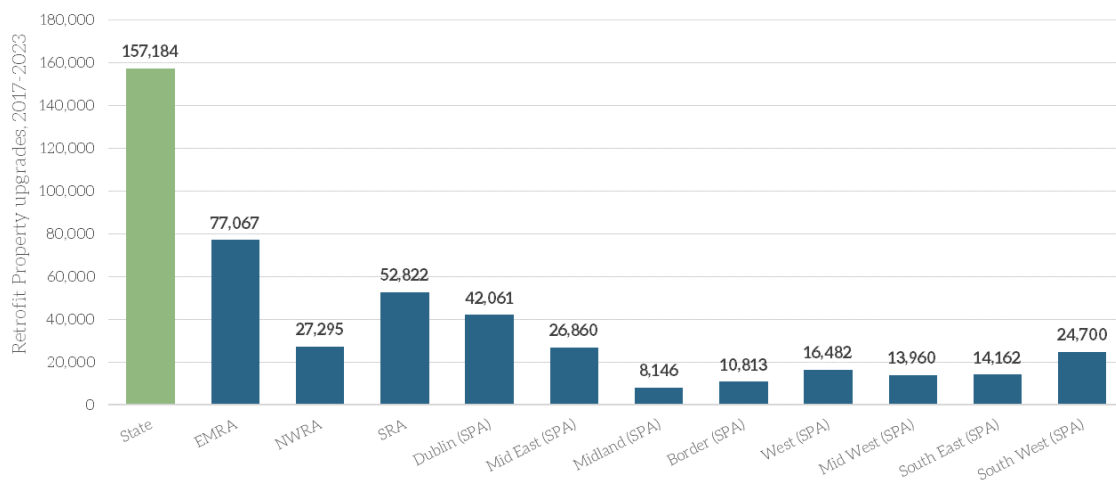
**Table 5.1 Sectoral Emissions Targets**

Sector	Reduction	2018 emissions	2030 ceiling
Electricity	75 per cent	10.5 MtCO <sub>2</sub> eq	3 MtCO <sub>2</sub> eq
Transport	50 per cent	12 MtCO <sub>2</sub> eq	6 MtCO <sub>2</sub> eq
Commercial and public buildings	45 per cent	2 MtCO <sub>2</sub> eq	1 MtCO <sub>2</sub> eq
Residential buildings	40 per cent	7 MtCO <sub>2</sub> eq	4 MtCO <sub>2</sub> eq
Industry	35 per cent	7 MtCO <sub>2</sub> eq	4 MtCO <sub>2</sub> eq
Agriculture	25 per cent	23 MtCO <sub>2</sub> eq	17.25 MtCO <sub>2</sub> eq
Other (F-gases, petroleum refining, and waste)	50 per cent	2 MtCO <sub>2</sub> eq	1 MtCO <sub>2</sub> eq

**Built Environment**

In relation to residential and commercial buildings, the built environment accounted for 11.1% of Ireland’s greenhouse gases in 2022, down from 12.3% in 2021. This reduction reflects significant strengthening of the Building Regulations from 2006 onwards, improved efficiency through retrofit, the adoption of new low carbon technologies and fuel switching. The introduction of the NZEB standard in 2019 has seen a 70% reduction in the emissions of new buildings.

**Table 5.2 Number of Retrofit Property Upgrades 2017-2023 (SEAI retrofitting Programme)**



Source: All Island Research Observatory (AIRO), Maynooth University

## Transport

The re-use of existing brownfield sites and buildings thereby reducing unnecessary carbon footprints on greenfield land for industry and residential development is critical to reducing emissions.

Where new building is required whether for residential or business purposes, it is sensible and sustainable to promote alignment between land use and transport planning in order to maximise reliance on public transport options and walking and cycling infrastructure and to reduce reliance on car-based transport in order to reduce carbon emissions.

There have been significant policy developments in the area of Transport which have a focus on reducing carbon emissions in the transport sector by enabling the shift to cleaner transport choices. These include the following:

- ***Sustainable Mobility Policy:*** The National Sustainable Mobility Policy (SMP) and Action Plan, which was published in April 2022, with a Leadership Group established in May 2022 to drive delivery of the SMP Action Plan and Pathfinder Programme. The Pathfinder Programme will bring increased momentum to the delivery of projects at a local level, providing templates for replication and scaling up elsewhere and with a strong emphasis on experimental and innovative approaches.
- ***Demand Management:*** Work on the development of a new National Demand Management Strategy commenced in 2023 and will develop future plans to free up road space in urban areas first to accommodate better public transport and active travel the aim of which is to reduce congestion in our towns and cities, improve air quality, and provide more and safer space for public transport, walking and cycling. Government fully recognises that any demand management measures being considered, such as road space reallocation, car-free zones and user charging will only be effective and equitable when alternative, public transport options are readily available, both in urban and rural areas. The Strategy, which is intended to be high-level in nature, will seek to identify and address any national

barriers to implementation at a local level. The Department of Transport has convened a steering group to oversee the development of the Strategy.

- **Strategic Rail Review:** The All-Island Strategic Rail Review (AISRR) has been jointly commissioned by the Department of Transport in Ireland and the Department for Infrastructure in Northern Ireland. Once finalised, the review will inform the future development of the railway system across the island of Ireland to 2050, in line with net-zero emissions commitments in both jurisdictions. The AISRR has focused on how the rail network across the island could contribute to the decarbonisation of the island's transport system, promote sustainable connectivity into and between major cities, enhance regional accessibility and support balanced regional development. The draft report and supporting documentation have been published as part of the public consultation requirements associated with Strategic Environmental Assessment (SEA).
- **Transport Orientated Development:** The Department of Housing, Local Government and Heritage and the Department of Transport jointly established a working group in December 2021 under 'Housing for All' action 26.1 to consider opportunities for Transport Orientated Development (TOD) in major urban centres. TOD is an established plan-led approach that seeks to provide high-density mixed-use development in close proximity to high quality transport services. The Dublin TOD Study was published recently and the working group is currently considering potential opportunities in the wider Dublin region as well the regional cities.

## Energy

As well as the requirements related to meeting the sectoral emission targets, there have also been regulatory and policy developments at an EU level that require Ireland to move towards a reduction in reliance on fossil fuels. Following the Russian invasion of Ukraine, in May 2022 the European Commission proposed the REPowerEU Plan to make the EU independent from Russian fossil fuels in advance of 2030.

The REPowerEU plan seeks to support the expansion of renewable infrastructure through a number of measures such as streamlining the permitting processes for wind and solar projects, including enabling widespread repowering of existing renewable projects. This is intended to be given effect through the Recast Renewable Energy Directive III (“RED III”), which proposes to require Member States to identify “renewables acceleration areas”. This will have spatial implications in relation to where renewable energy developments can be prioritised for delivery.

CAP23 includes an action to publish a Renewable Electricity Spatial Policy Framework (RESPF), which is currently being prepared by the Department of the Environment Climate and Communications (DECC) and will set out national and regional targets for onshore wind energy and grid-scale solar development. CAP23 also includes an action relating to the publication of a Regional Roadmap and thereafter the requirement for Regional Assemblies to publish and implement Regional Renewable Electricity Strategies. CAP23 also commits to publishing a revised methodology for Local Authority Renewable Energy Strategies.

Consequently, there will be spatial implications related to planning for wind and solar developments to support the transition to a more renewables based energy sector. The NPF revision will need to take adequate account of the policy and regulatory frameworks that have emerged over the past five years and ensure that appropriate national planning policy measures are in place to complement and support Ireland’s ambitions in this regard.

## **Biodiversity**

Ireland’s fourth National Biodiversity Action Plan (NBAP) was published in draft form in 2022 and is due to be finalised shortly. The National Biodiversity Action Plan has recently been given greater legal status through the recently-passed amendment (July 2023) to the Wildlife Act (2000) by insertion of a new Section (59B(1)). Ministerial

Directions may now issue to ensure compliance with the NBAP<sup>9</sup> by public bodies, including An Bord Pleanála and local authorities.

The newly established All-Island Climate and Biodiversity Research Network (AICBRN) brings together researchers from a wide range of disciplines across the island of Ireland who are undertaking research in climate and biodiversity topics.

The European Commission has published a proposal for the EU Nature Restoration Law which proposes to restore at least 20% of the EU's land and sea areas by 2030 and repair all ecosystems in need of restoration by 2050.

The proposed Nature Restoration Regulation provides an opportunity to restore nature, both nationally and across the wider EU region. Nature restoration can also deliver substantial co-benefits for climate action such as carbon emissions reduction from the land use sector, as well climate adaptation and resilience through the enhancement of natural buffers against flooding and coastal inundation.

The European Parliament voted in favour of the NRL in July 2023, based on the General Approach agreed by the European Council, with amendments. The proposed Regulation is currently at Trilogue stage for discussion and finalisation.

The final Regulation, once ratified, will come into force, and Member States, including Ireland, will have two years to prepare a National Restoration Plan. As the Regulation encompasses a wide range of land uses including urban, agricultural and afforested landscapes, both in State and private ownership, it will have policy, legislative and sectoral implications across many Government Departments. These measures will require, when finalised, to be incorporated into the Irish planning system, through legislation and policy. The potential to incorporate this forthcoming Regulation within the NPF revision will depend on the timing of adoption of the Regulation.

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<sup>9</sup> Recommendations from the Citizens' Assembly on Biodiversity Loss are being reviewed for incorporation into the final version of the NBAP.

## Coastal Zone Management

The Government's Climate Action Plans 2021-2023 identify that increases in sea levels and storm surge will result in increased frequency of coastal flooding and erosion, with significant impacts for coastal and heritage sites situated in proximity to the coast and in estuaries. The current evidence points to a gradual sea level rise of up to 1 metre to the year 2100 due to climate change. This will further and significantly change our coastline and could adversely impact on our coastal economy, society, heritage, culture and environment, if such change is not managed appropriately.

The Government established an Inter-Departmental Group on the National Coastal Change Management Strategy to scope out an approach for the development of a national co-ordinated and integrated strategy to manage the projected impact of coastal change to our coastal communities. The Inter-Departmental Group is jointly chaired by the Department of Housing, Local Government and Heritage and the OPW and is supported by a Technical Working Group. The scoping report on Managing Coastal Change will be submitted to Government for consideration and approval shortly, following which the report will be published.

### 5.1.3 What Could a Potential Change Look Like?

Land is a finite resource. Our population is increasing and with that comes a need to plan for the housing, employment, health, education facilities and amenities required by the growing population, along with the infrastructure required to support development. It is critical that we manage this growth in a sustainable manner being cognisant of the delicate balance between the built environment, natural environment, biodiversity and climate.

The revision to the NPF needs to consider these matters in order to ensure sustainable development for our planet and future generations.

*Q. Given the scale of the challenge, what measures and policies should the NPF revision prioritise in order to give urgent effect to addressing climate change, including the need to enhance biodiversity?*

*Q. Delivering sustainable development is cross-sectoral and in order to strive to achieve our sectoral emissions targets, the need and potential for improved working arrangements with other policy areas in relation to the pattern and location of development and related decision making processes will need to be considered. How can the NPF revision respond to this need and deliver improvements in the alignment of policies and ultimately the decisions of varying sectoral interests?*

*Q. How can the revision seek to identify the principles for priority locations for varying land needs, particularly the locations for the deployment of renewable energy infrastructure across the country?*

## **5.2 Population and Demographics**

Population growth and demographic change are vital considerations for the NPF revision. The NPF sets out that the population of Ireland will increase by around one million people or by 20% over 2016 levels, to almost 5.7 million people by 2040. The role of the NPF is focussed on the spatial distribution of this population growth across the Country, so the revision to the Framework must carefully consider the outputs of Census 2022 in the context of both overall national population and demographic trends and, in particular, the spatial distribution of population relative to the key objectives of the Framework.

### **5.2.1 What Has Changed?**

The ESRI work undertaken for the NPF in 2018 indicated that Ireland's population will grow by around one million additional people, to almost 5.7 million people by 2040.

The ESRI modelling factored in econometric data, including employment and house prices and modelled the spatial distribution of the projected population.

Having regard to the projected population growth and the 50:50 strategy outlined earlier in this paper, the current NPF involves planning for growth in each of Ireland's three regions as follows:

- for the Eastern and Midland Region an additional 490,000 - 540,000 people (i.e. a population of around 2.85 million),

- for the Northern and Western Region and additional 160,000 - 180,000 people (i.e. a population of just over 1 million) and

- for the Southern Region an additional 340,000 - 380,000 people i.e. a population of almost 2 million.

The Planning and Development Act 2000 (as amended) requires any revision to the NPF to address future population change as part of the revision process:

*‘Any document, ..that .. revises or replaces the National Planning Framework shall **address** the identification of nationally strategic development requirements as respects cities, towns and rural areas in relation to employment, **future population change**, and associated housing and commercial development requirements...’*

## **Census 2022**

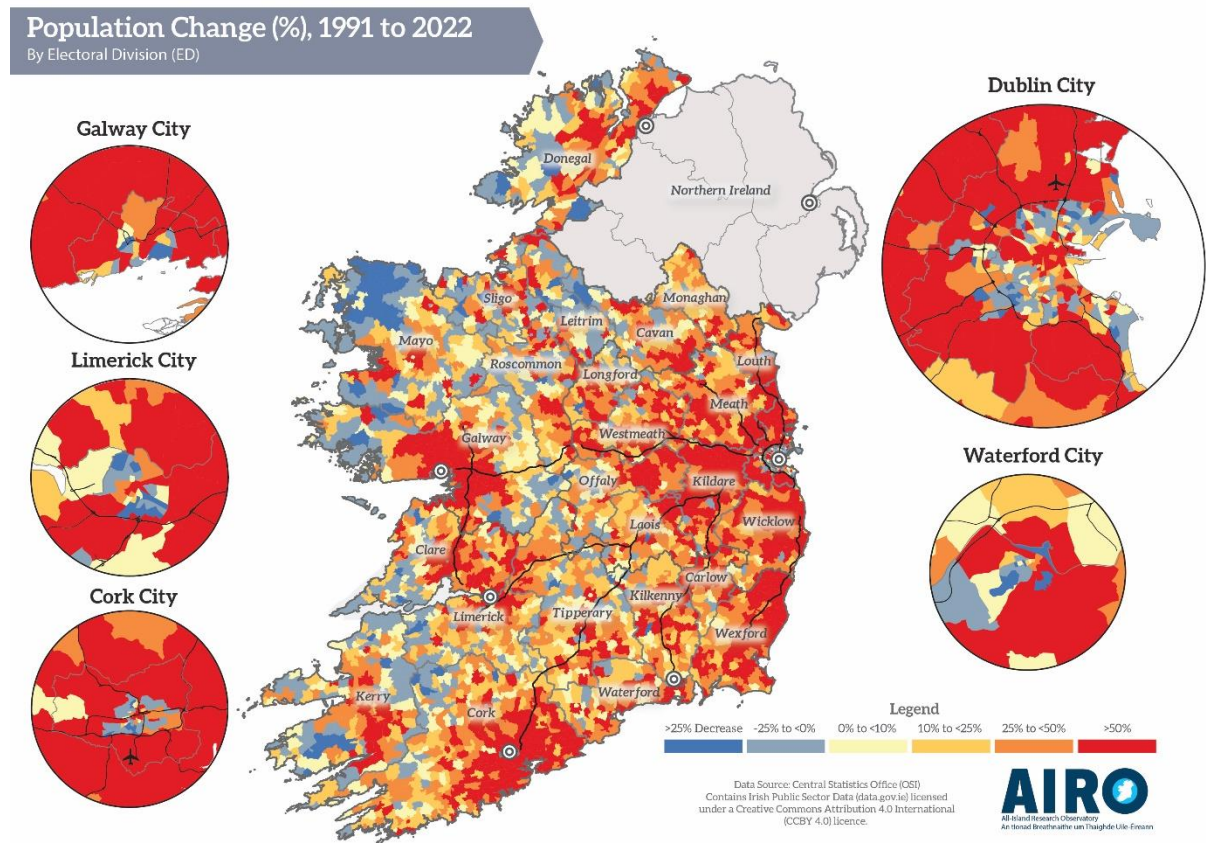
The results of Census 2022 are in the process of being published, with a number of releases available at present. A summary of the some of the key findings to date is outlined below.

### ***National Population Figures***

The population increased by 8.1% compared with the 2016 census and there were 5,149,139 people in the State on 3<sup>rd</sup> April 2022. This is the first time that a census has recorded a population of more than five million people since 1851.



## Map 5.1 Population Change (%), 1991 to 2022



Source: All Island Research Observatory (AIRO), Maynooth University

Over a thirty year period, Ireland's population has increased by more than 1.6 million (32%), from 3.5 million in 1991 to 5.149 million in 2022 (CSO Census). Coupled with this, the number of housing units in Ireland has more than doubled, from 1.0 million in 1991 to 2.1 million in 2022.

Between 2016 and 2022, Ireland's population increased by 387,274. Natural increase (the difference between the numbers of births and deaths in a population) made up 167,487 of the change, with the estimate for net migration at 219,787. This represents an annual average increase of almost 65,000 people. Map 5.1 above indicates that the trend related to the concentration of development taking place around the edge of Ireland's cities has intensified over a thirty-year period.

Census 2022 presents data on the components of population change – migration and natural increase. This data ('Average annual rates of population growth per 1000 of population') is presented spatially, it is possible to identify areas of the country where the rate of population growth is influenced to a greater degree by natural increase or migration trends.

The data indicates a greater rate of natural increase in Dublin and the mid-east – highest in Fingal, Kildare, South Dublin and Meath. Kerry and Mayo had the lowest annual average natural increase with 3 people per 1,000.

### ***Migration***

The average annual rate of growth for the migration component is highest in Longford, Meath, Leitrim, Roscommon and Waterford. The counties with the lowest annual average net migration include Kilkenny and Tipperary, both at 4 people per 1,000.

There is significant volatility in migration trends, which while they tend to follow economic cycles have other less predictable factors, most obvious in recent years with the invasion of Ukraine and resulting humanitarian crisis which now sees 80,000 Ukrainians granted asylum in Ireland.

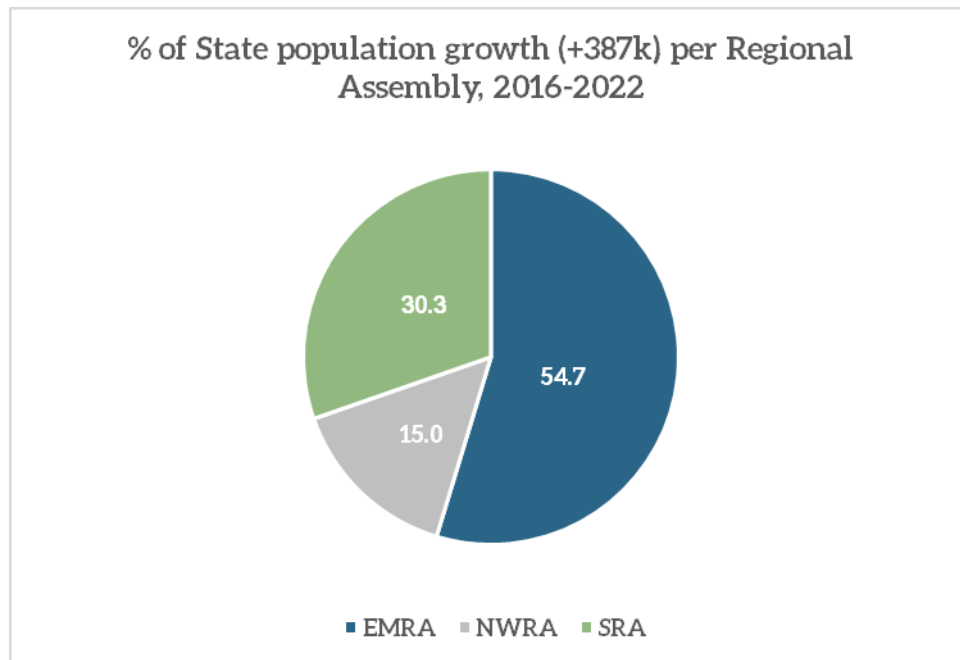
Census 2022 indicated a number of migration trends that may not have been predicted – a substantial decline in the number of both Polish and UK migrants. These two countries represented the largest cohorts of migrants to Ireland (in combination comprising almost a third of all migrants).

In terms of regional growth, the pattern is one of all three regions growing, however less than the national average of 7.6% in the NWRA (6%) and SRA (6.8%). EMRA (8.7%) performed above the average but also accounted for 56% of overall population growth, nationally since Census 2016.

In summary, results from Census 2022 show that national population growth is broadly in line with the overall NPF population projection to April 2022. The NPF projected a population of just over 5.1m people in Ireland in 2022 and the Census indicated 5.15m people (50,000 more than that projected).

However, as Figure 5.1 below indicates, the distribution of growth over the 2016-2022 period was weighted in favour of the east, with more than half of population growth in the Eastern and Midlands Region during that time.

**Fig 5.1 Proportion of National Population Growth 2016-2022**



Source: All Island Research Observatory (AIRO), Maynooth University

In terms of planning for an ageing demographic, since the adoption of the NPF the National **Age Friendly Ireland** Programme has grown and delivered a wide range of policy supports. Age Friendly Ireland is a shared service function of local government sector and provides a national centralised service to support the ongoing development, implementation and sustaining of the programme's national strategy. There is an opportunity for the NPF revision to address this policy area more comprehensively and consider the appropriate policies for Ireland's ageing population in a spatial planning context.

### 5.2.2 Policy Issues

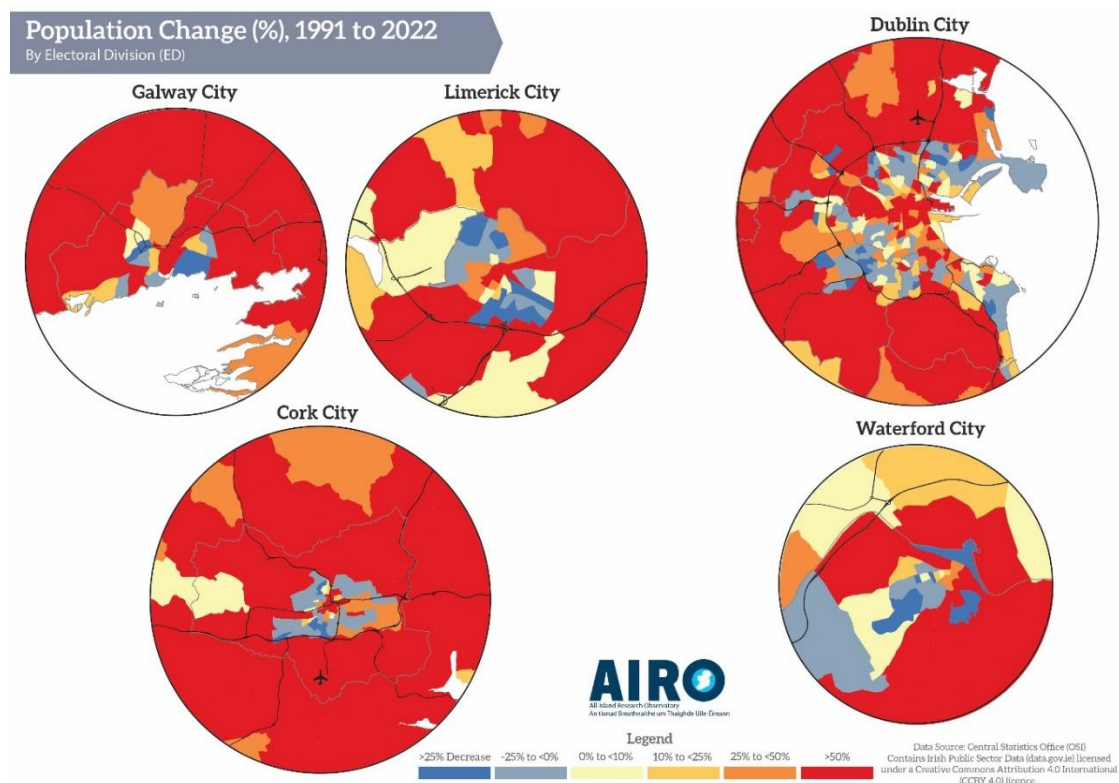
Population and demographic trends present a number of policy implications for the revision of the NPF. Overall, population growth is slightly ahead of forecasts with strong migration trends, which will have to be considered when modelling the migration

scenario for future population growth scenario. The results of the census also show an increasingly ageing and diverse population.

### Continued strong population growth in city hinterlands

The census results also confirm a continued strong population growth (and demand for housing) in the mid-east region around Dublin and also in the hinterland of other cities, Cork in particular. The trend of strong growth in the hinterland of the cities is evident in Map 5.2 below.

**Map 5.2 Percentage population change in the five cities 1991-2022**



Source: All Island Research Observatory (AIRO), Maynooth University

An analysis of housing trends in the [‘Housing Delivery Tracker’](#) (an online tool developed by DHLGH which presents all of the local authority core strategy housing targets for each settlement set against the actual construction trends) shows that the majority of cities and large settlements are not meeting the housing targets set in Development Plans – with the notable exception of towns in the extended hinterlands of Dublin and Cork.

At this early stage of NPF implementation and given the relatively recent associated adoption of the regional strategies and local level development plans, it is unrealistic to expect evidence of significant changes in population and housing trends, however it may be necessary for the NPF revision to consider if policies and objectives need to be strengthened or amended in response to early indicators.

### **Ageing and more diverse profile**

While Ireland presently has quite a young population by European standards, the country is ageing faster than almost anywhere else in Europe.

Census 2022 confirmed a number of continuing trends in this regard:

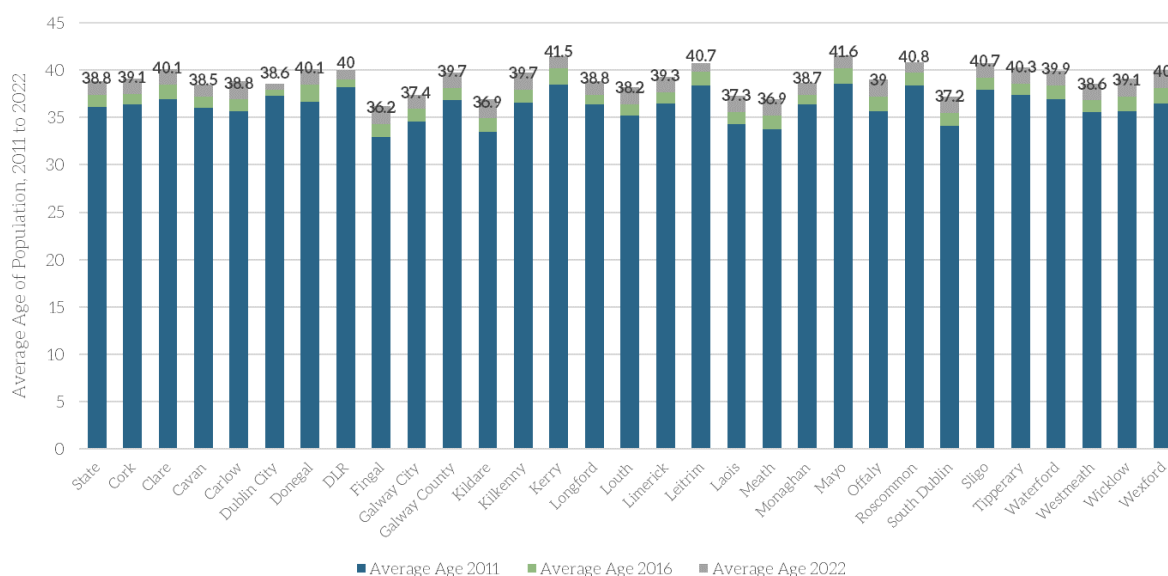
- The highest increase in population cohort was seen in the over 70s at 26%
- The average age of the population has increased from 36.1 (2011) to 37.4 (2016) to 38.8 (2022).
- In the 11 years between 2011 and 2022, the average age increased by 2.7 years and by 3.7 years since 2002.
- The average age was 38.2 years for males and 39.4 for females.

In terms of the spatial trends, Fingal, Kildare and Meath continued to be the counties with the youngest age on average. Mayo, Kerry, Roscommon and Leitrim had the oldest populations.

There is a complexity to the characteristics of an ageing population and older people are an increasingly diverse cohort. For instance, an estimated 80,000 people aged 66 plus remain at work and this is a fast growing cohort.

In the recent census, the 'average age' of each county generally indicates an older age in the western seaboard counties. Table 5.3 shows the increase in 'average age' in each local authority area in the eleven year period from 2011. The fastest rate of change occurred in the EMRA region generally.

**Table 5.3 Average Age of Population 2011-2022**



Source: All Island Research Observatory (AIRO), Maynooth University

To put the ageing trends in a European context, Eurostat report on ageing across the EU and in 2022, the median age of the EU’s population reached 44.4 years, 0.3 years more than in 2021. It has increased by 2.5 years (on average by 0.25 years per annum) from 41.9 years in 2012. By comparison, Ireland’s median age was 38.8 years.

### Impacts of moving into a high migration scenario for the Strategy

There are a number of implications if adjustments are made to population projections based on Census 2022 outputs, if those outputs suggest that a higher migration scenario should be considered. An overall increase in forecast population would require a revisiting of regional population forecasts within the context of securing a greater balance in regional distribution and would have implications for structural housing demand at local authority level. A fundamental challenge for the NPF revision is to accommodate any growth within the context of the requirement to meet binding sectoral carbon emission ceilings.

The Report of the Expert Group recommends more ambitious compact growth targets. A key challenge will be to ensure that any increase in housing targets is considered in the context of the overall objective of promoting compact and sustainable development patterns and avoiding further sprawl. Any increase in overall population forecasts will

also have implications for the Framework in relation to infrastructure services provision and environmental capacity.

### **Resolving how best to meet needs of growing population and associated housing demand where demand is highest**

Census 2022 indicates that population growth has continued to be strong in the mid-east counties around Dublin. The population of both Kildare and Meath more than doubled in the years since 1991, compared to a population increase for the state overall of less than 50% during the same period. The challenge of serving this scale of population increase with necessary social and community infrastructure and public transport services has been significant. Notwithstanding this however, there continues to be strong market demand for housing in these areas and market capacity to deliver.

The NPF framework envisages, over time, a more moderate rate of growth in this area, compared to historic trends. The policy approach to date has been to facilitate a 'convergence' over time between historically high rates of housing delivery in these areas and more moderate housing targets envisaged in the longer run.

Any potential revisions to the population and housing forecasts within the NPF must have regard to the early phase of implementation of the Framework, reflecting on the spatial distribution of population growth evident in the census results, and also on the wider policy commitment to effecting balanced regional development and delivering on the potential of the Cities.

### **5.2.3 What Could a Potential Change Look Like?**

The ESRI are currently undertaking demographic and econometric modelling work, taking account of the results of the 2022 Census, to update previous research on structural housing demand and produce an updated range of scenarios for long-run new household demand in Ireland.

Any revision to the NPF and targets will take into account, amongst other things, unmet need in previous years, population growth and updated assumptions regarding household sizes.

*Q. What factors should be considered in incorporating any revised projections into the revision to the NPF?*

### **Planning Policies for an ageing population**

The NPF provides an overarching objective in relation to meeting the needs of an ageing population. National Policy Objective 30 of the NPF provides that local planning, housing, transport/accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population, along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.

*Q. In light of the evidence in Census 2022 cited above regarding the rapidity of the ageing population in a European context, are additional planning policy measures necessary, and if so, what should this include?*

## **5.3 Regional Growth and Ambition**

### **5.3.1 What Has Changed?**

The NPF in 2018 recognised that continued investment in Dublin and the east is critical to support the future growth of Dublin as an international city of scale in the national interest, but that this needs to be supported by a more balanced distribution of growth across all of Ireland's regions. The strategy recognises that the 'business as usual' approach will not make the most effective and sustainable use of national and regional assets and resources. In contrast, more balanced and effective regional growth will harness the attractiveness and assets of all regions and places to a greater extent than to date.

Ireland has experienced economic and population growth since the early 1990's that is significantly above the EU average. The total number of people at work has more



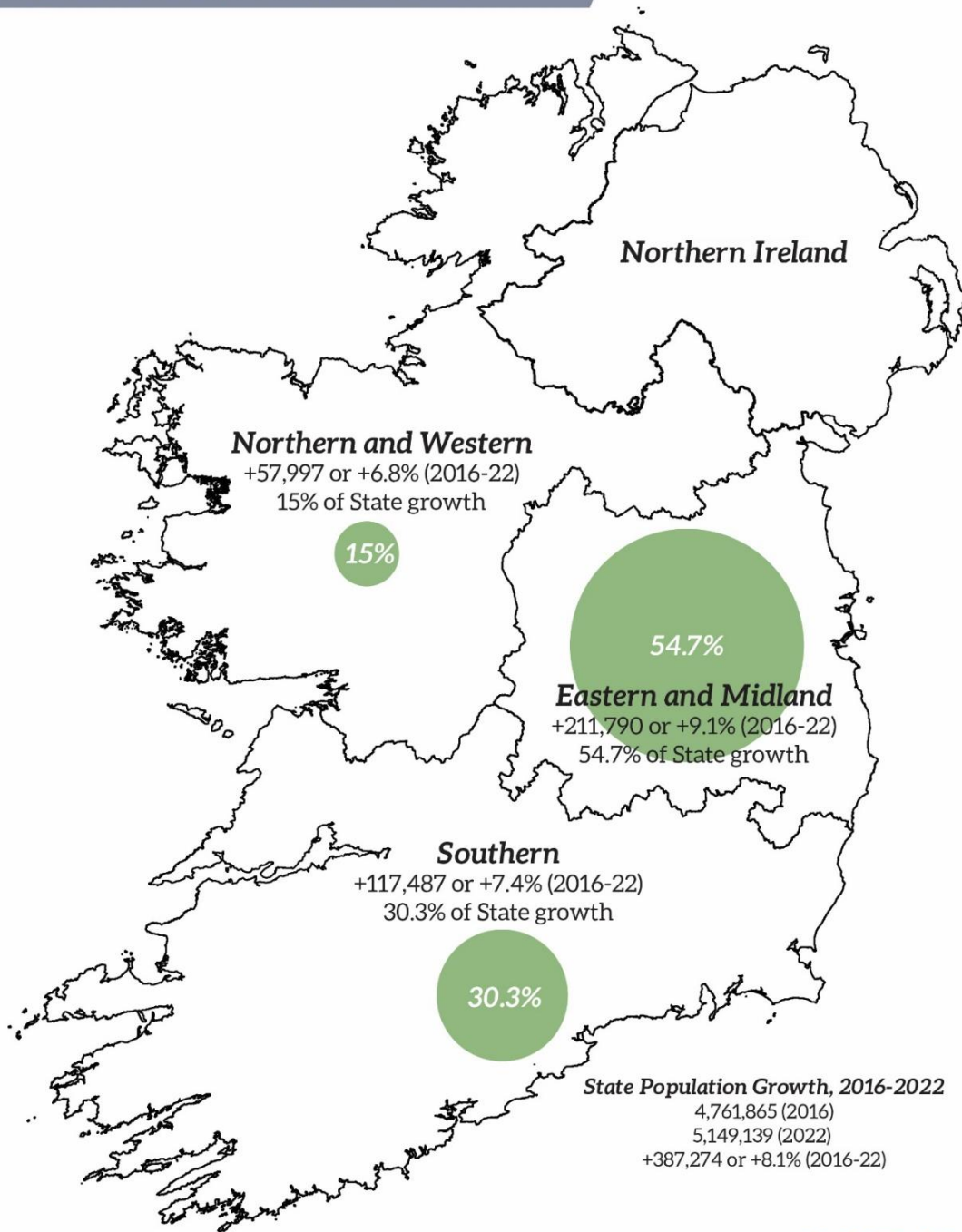
than doubled, from 1.15 million in 1990 to 2.76 million in 2023 (CSO 2023). Much of this growth is the result of foreign direct investment by high-tech industries in major urban centres.

During the period of growth since the early 1990's, Dublin has grown to become an international capital city of scale. Data shows that the majority of growth in jobs, population and housing over the last 30 years occurred in Dublin and the surrounding Eastern Region. Termed 'business as usual', this pattern of growth has resulted in the significant primacy of Dublin and the Eastern Region and has given rise to capacity constraints in Dublin and the east, particularly in the areas of housing and infrastructure.

Emerging changes in population distribution across the regions detailed in Census 2022 are encouraging. Demographic data over the last 30 years has shown a long-term trend of population growth concentrated within the Eastern and Midlands Regional Assembly (EMRA) area with census 2016 indicating a 70/30 split in population growth between the EMRA area and the rest of the country. Census 2022 shows a softening of this 'business as usual' pattern, evident in Map 5.3 below, with population growth split 55/45 between the EMRA area and the rest of the country.

### Map 5.3 Regional % Share of National Population Growth 2016-2022

% share of State population growth within the Regional Assembly areas, 2016 to 2022



Data Source: Central Statistics Office (CSI)  
Contains Irish Public Sector Data (data.gov.ie) licensed  
under a Creative Commons Attribution 4.0 International  
(CCBY 4.0) licence.

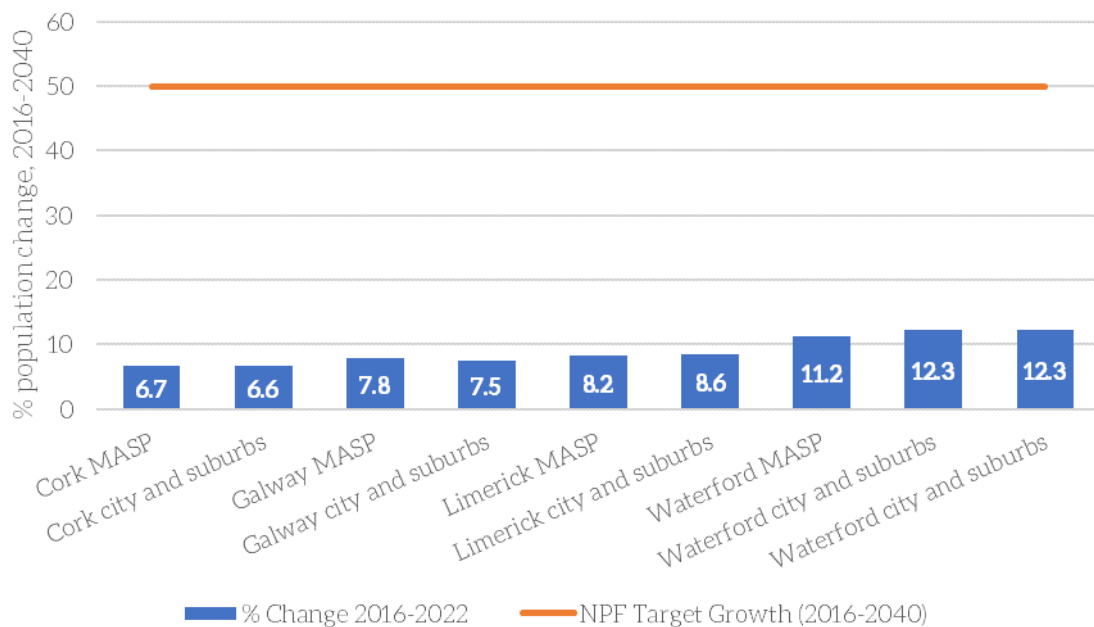


Source: All Island Research Observatory (AIRO), Maynooth University

Census 2022 shows that the proportion of national population growth achieved in the five cities was c.124,543 persons or 32% of overall growth. While this is below the 50% NPF target, there are positive indicators in relation to city growth. The cities of Waterford and Limerick with growth of 12% and 9% respectively, exceeded the national average growth rate of 8%. The growth in Dublin at 8% was aligned to the national average, while Cork and Galway with growth of 7% fell below the national average. Census data for Cork shows accelerated city centre growth at over 19% in some small areas, and strong growth also within the urban towns.

Figure 5.2 below demonstrates that in order to achieve the NPF target of 50% growth within these cities, a growth rate of at least 10% needs to be achieved for each intercensal period between now and 2040, showing that more needs to be done to support the city growth targets to 2040.

**Figure 5.2 Distance to Target for the Five Metropolitan Area Strategic Plan Areas**



Source: All Island Research Observatory (AIRO), Maynooth University

In the EMRA area, the balance of population growth between the Dublin Region and the Eastern Region area shows positive results in terms of city focused population distribution. The majority of population growth at 52% occurred in the Dublin Region (Dublin City, Dun Laoghaire Rathdown, South Dublin and Fingal) with 36% of growth

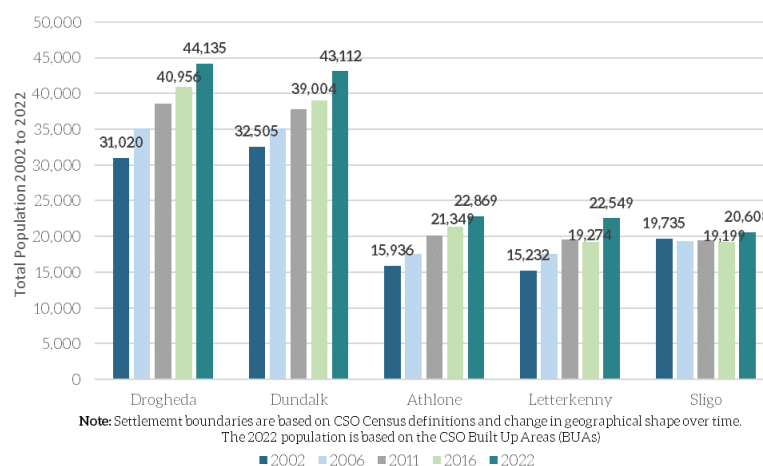
occurring in the eastern region. The Midlands Region accounted for the remaining 12% growth.

In addition to the review of traditional population growth data, the NPF established a focus on the delivery of ‘structural housing targets’ that are aligned to the development objectives of the NPF. Through the hierarchy of development plans established in legislation, specific housing targets are set out in each City and County Development Plan, informed by the targets contained within the NPF and regional strategies (RSES). A review of Census 2022 results indicates an increase in housing stock of c.120,945 dwellings during the intercensal period.

In terms of regional balance, the EMRA region accounted for 58% of this growth (c.69,679 dwellings) with the remaining 42% in the rest of the country. At county level, the rate of housing delivery averaged between 5% and 6%; however, this percentage rose to c. 12% in County Meath and County Kildare, illustrating a continued pressure for development of new housing in the Dublin commuter belt.

In addition to Ireland’s five cities being targeted for growth in order to become cities of scale in the NPF, the framework also included five regional centres as part of the strategy approach to strengthen Ireland’s overall urban structure and act as focal points for compact growth.

**Figure 5.3 Population Growth in Regional Growth Centres 2002-2022**



Source: All Island Research Observatory (AIRO), Maynooth University

The move towards a more regionally balanced and city-focused growth will be important in ensuring effective regional development and in supporting overall competitiveness, economic prosperity, environmental sustainability and climate adaptation.

A number of key strategic actions have been identified since 2018 to reinforce the NPF strategy for regionally balanced, city focused and compact growth and work is ongoing to develop these actions. These include:

- continued focus on regional economic development and infrastructural investment through the NDP and PI2040, with particular emphasis on the regional cities;
- enhanced institutional and governance arrangements for city-scale development that will enable delivery of strategic priorities at a city level;
- continued implementation and roll-out of actions on housing delivery, especially those addressing housing affordability and viability, land activation in urban areas through the introduction of the Residential Zoned Land Tax and proposals relating to Land Value Sharing and Urban Development Zones, planning reform and the enhanced role of the Land Development Agency;
- the identification of strategic medium to long term sustainable development options for cities and regional growth centres; and
- robust monitoring and reporting on trends in housing delivery and economic activity.

### **5.3.2 Policy Issues**

The Report of the Expert Group highlights that the commitment to regional rebalancing in the NPF will be increasingly important as we continue to experience demographic change, as environmental and climate issues have taken on new prominence and as major economic and social changes emerge across the globe. The Report also points to the need for a coherent spatial planning framework that can play a tangible role in influencing the operational decisions of key actors.

## The Cities

It is of note that Ireland's five cities are administered by twelve local authorities, while at a regional scale, the three regional assembly areas each include at least one city authority, together with a further seven to eight adjoining local authorities.

The city focused growth strategy is based on ambitious growth targets for the cities of Cork, Limerick, Galway and Waterford, relative to their historic growth rates, with each projected to grow by at least 50% by 2040. The ambition is for investment and jobs led growth in the cities that will support a stronger urban structure and enhanced economic performance and investment for the wider region. This will require improved infrastructure, quality of life and choice in terms of housing, employment and amenities in each of the cities.

The Report of the Expert Group specifically addressed the need to make the Metropolitan Area Strategic Plans for the five cities more effective:

### **Expert Review Group - 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.

## **Transition to NPF Strategy – Giving Effect to Balanced Regional Development**

In translating the long term population growth scenarios into shorter term housing delivery targets, especially in the period to 2031, a 'convergence' scenario, which is a mid-point between 'business as usual' and NPF projections, has been applied to 2026<sup>10</sup>. However, it is clear from the results of Census 2022 and other development indicators that the regional and city growth targets set by the NPF remain challenging.

Nonetheless, Census 2022 results do demonstrate some positive indicators in relation to regional balance with the Eastern and Midlands Region (which includes Dublin, Kildare, Louth, Meath and Wicklow) having a reduced share of overall growth relative

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<sup>10</sup> Implementation Roadmap for the National Planning Framework July 2018 refers.

to the previous census period. The achievement of city growth targets is more challenging with a significant proportion of the growth in population and housing still occurring at the periphery of the built up area of the cities and in surrounding counties.

This is particularly acute in the case of Dublin, with the surrounding counties of Kildare, Meath and Wicklow experiencing population growth that is significantly above the national average, while the Dublin City administrative area has experienced population growth that is below the national average. It is clear from available data and indicators that there will be a longer transition into the NPF scenario than envisaged in 2018.

In the context of the review and any revisions to the NPF, the reality of a slower transition may need to be considered, in addition to the potential need for a suite of actions designed to reinforce and accelerate the NPF strategy.

### **5.3.3 What Could a Potential Change Look Like?**

#### **Prioritisation as a Catalyst**

In considering any potential revision to the targets for the regions and the cities as part of the revision, it will be important to adequately account for any regional development challenges and the opportunities related to the attractiveness and strengths of Ireland's three regions – for example housing, infrastructure, foreign direct investment (attraction) and enterprise development.

*Q. How can shorter-term housing and growth needs be accommodated, while continuing to deliver the strategic actions needed to ensure that the broader NPF ambitions for regionally balanced and city focused growth are met in the medium to longer-term?*

*Q. Given the scale of the ambition, should consideration be given to focussing in the shorter-term on investment and jobs-led growth in particular locations, while concurrently planning for a more graduated transition at other locations?*

## **Governance and Institutional Structures**

It is of note that Ireland's five cities are administered by twelve local authorities, while at a regional scale, the three regional assembly areas each include at least one city authority, together with a further seven to eight adjoining local authorities.

*Q. Are there policy, governance or implementation gaps within the regions and cities that are affecting the delivery of regional and city growth targets?*

*Q. Do growth targets adequately consider regional development challenges and opportunities related to the attractiveness and strengths of regions – for example housing, infrastructure, foreign direct investment (attraction) and enterprise development?*

## **Legislative and Policy Frameworks**

*Q. Is there a need to consider amendments to the legislative and policy framework to support NPF implementation from a regional ambition perspective, particularly in the context of the role of Local Authorities, Regional Assemblies and other public bodies and agencies to act as agents for more balanced spatial development within their regions?*

*Q. Are there implementation mechanisms that could be introduced to remove barriers that are affecting the delivery of the NPF objectives? In this regard, can actors and programmes be afforded new competences, scaled, or new mechanisms be introduced to ensure accelerated delivery of NPF population and investment targets?*



## **5.4 Compact Growth**

### **5.4.1 What Has Changed?**

The compact growth policy of the NPF specifically addresses the identified need for a more sustainable form of development in Ireland's cities and towns, in particular. Its introduction was in response to an identified need to counter the trend of urban sprawl, to support the targeted delivery of infrastructure services, to promote cities and towns to be self-sustaining and viable places to live and work in. Compact growth policy will ensure a close alignment with the United Nations Sustainable Development Goals (SDGs) and SDG 11 in particular in relation to 'sustainable cities and communities', which aims to make cities inclusive, safe, resilient and sustainable.

The targeting of a more compact form of urban development is, therefore, a cornerstone policy of the National Planning Framework. To this end, specific performance targets have been set out in the NPF in relation to the proportion of new residential development that should take place within the existing built up area of settlements of different scales.

NPF National Policy Objectives 3b and 3c establish a target to deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs and at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints. These targets have now been integrated into policy at a local level in recently adopted city and county Development Plans and have informed land use zoning and the devising of core strategies.

In addition to creating a more sustainable outcome, delivering housing within the existing built up area of cities and towns has the potential to make a major contribution to diverse housing needs, by catering for a wide array of different house types.

### **Policy and Initiatives**

Since the adoption of the NPF in 2018, there have been a number of developments in national policy that have a bearing on the compact growth objectives of the Framework. In addition, a range of initiatives and funding programmes have been introduced to incentivise and facilitate compact growth.

- *Climate Action Plans* – the importance of the compact growth agenda has been strongly identified in successive climate action plans. Securing ambitious compact growth objectives will have a direct effect on influencing the need to travel, on modal choice and has the potential to assist in delivering on transport-related emissions targets. Along with specific compact growth actions which are referenced in CAP23<sup>11</sup>, the wider importance of achieving compact growth objectives to support a number of climate action themes is stressed in CAP23.
- The Town Centre First Policy was launched in 2022 and provides a co-ordinated, whole-of-government policy framework to proactively address the decline in the health of towns across Ireland and support measures to regenerate and revitalise them. Key to Town Centre First are local communities and local businesses who now have the opportunity to reimagine and shape the future of their town/ village through the development of a Town Centre First Plan with the support of a dedicated Town Regeneration Officer and their Local Authority. In phase one, a Town Centre First Plan is to be developed for c.30 towns around the country.
- The recent publication of Draft Section 28 Ministerial guidelines [Sustainable and Compact Settlements - Guidelines for Planning Authorities](#) proposes new models of residential density and expands on policy in relation to compact growth and in relation to the creation of attractive, liveable, well-designed, high quality urban places. The guidelines, when finalised, will enable appropriate residential density standards to be applied to a greater range of settlements than current guidance, from cities to smaller towns and villages. They will also better reflect the different place contexts within each settlement, from centre to edge. They will allow flexibility in relation to residential design standards in support of the construction of more compact ‘own-door’ housing, alongside traditional housing and apartment developments.
- URDF/RRDF - The Urban Regeneration and Development Fund (URDF) and its rural counterpart, the Rural Regeneration and Development Fund (RRDF) aim to

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<sup>11</sup> Climate Action Plan 2023

facilitate more compact and sustainable development. The funds were proposed initially in the NPF and comprise a €3 billion investment in regeneration and rejuvenation projects in Ireland's five cities and other large towns. Since the adoption of the NPF, the URDF now part-funds 132 projects, comprising of almost 400 subprojects, right across the country. Many of these projects have the potential to be transformative for the urban core of towns and cities and to make a positive impact on town and city centre placemaking. The third call of URDF, launched this year, specifically addresses long term vacancy and dereliction across our cities and towns and targets the acceleration of the provision of residential accommodation.

- The Residential Zoned Land Tax (RZLT) was introduced by the Finance Act (2021) with the purpose of activating land that is serviced and zoned for residential or mixed use including residential in order to increase housing supply and to ensure regeneration of vacant and idle lands in urban locations. This measure is focused on delivering on the compact growth objectives by targeting zoned and serviced land, which has benefitted from investment in infrastructure. The associated mapping process also facilitates the identification of lands requiring future investment in infrastructure.
- There have also been a range of funding initiatives and policy supports focussed on incentivising and enabling town and city centre residential development since the adoption of the NPF:
  - The **Croí Cónaithe (Cities) Scheme** is a fund to support the building of apartments for sale to owner-occupiers. The Scheme aims to bridge the current “viability gap” between the cost of building apartments and the market sale price (where the cost of building is greater).
  - **Croí Cónaithe (Towns) Fund** comprises two schemes which are delivered by local authorities, the ‘Vacant Property Refurbishment Grant’ which provides people with a grant to support the refurbishment of vacant properties while under the Ready to Build Scheme, local authorities make

serviced sites available in towns and villages at a discounted rate to individuals who want to build their own home.

- **Project Tosaigh**, which was launched in November 2021, is a market engagement initiative aimed at accelerating delivery by the Land Development Agency of housing on sites with full planning permission that are not currently being developed by private sector owners due to financing and other constraints.

### **Compact Growth Targets**

A number of the recommendations of the Expert Group focussed on the issue of compact growth in the implementation of the NPF. The review of the Expert Group noted that, while the establishment of compact growth targets in the NPF have been a useful step forward in the containment of urban sprawl the 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)... and allows county and city development plans (and individual project approval decisions) to depart from national ‘compact growth’ principles at a significant scale.”* The Expert Group concluded that *“In effect the current targets are insufficiently ambitious”*.

#### **Expert Review Group - Recommendation 2**

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

The Expert Review Group also made recommendations in relation to monitoring and evaluating the implementation of the Framework, including the establishment of outcome metrics and a robust annual monitoring process for objectives such as the promotion of ‘compact growth’.

The Group also reflect on the continuing trend of rural housing development in recommendation 3 of the Report of the Expert Group as follows:

#### **Expert Review Group - 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.

### **Progress in achieving Compact Growth**

Compact growth targets are still at an early phase of implementation, having been integrated into the latest cycle of city and county development plans only recently.

Examining data for housing completions in 2022, for example, the NPF target of ‘40% of development to be located within the built up area’ has been comfortably achieved in all but two counties, with the average rate across all counties at c.60% of development taking place within settlement boundaries.

How compact growth is measured will continue to be important in ensuring its delivery.

### **5.4.2 Policy Issues**

#### **Compact Growth for Liveable Places**

Achieving a more compact form of urban growth is a primary goal or ‘*National Strategic Outcome*’ of the NPF on the basis that it will add value and create more attractive places in which people can live and work.

*“From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and*

*villages and ensuring that, when it comes to choosing a home, there are viable attractive alternatives available to people<sup>12</sup>.”*

### **Compact Growth as Climate Action**

In addition to the sustainable development and placemaking rationale, there is a compelling case that the requirements of the Climate Action and Low Carbon Development Act and successive Climate Action Plans and the scale of the targets for emissions reductions will require an acceleration in the delivery of compact growth.

CAP23 includes carbon budgets and sectoral emissions ceilings and sets out a roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050.

One of the six “vital high impact sectors” identified by Government is transport, with a 50% reduction in emissions targeted for 2030. Some of the actions which will deliver on these ceilings include, for example, reducing the total distance driven across all car journeys by 20% and for walking, cycling and public transport to account for 50% of all journeys. Clearly, these targets require not just a ‘high impact’ transport-specific policy response, but a major shift in land-use planning policy if they are to support and complement the achievement of more compact development patterns in our cities and towns rather than further urban sprawl with associated extended commuting and movement patterns.

### **Compact Growth and Regional Development**

Compact growth has the potential to contribute to the achievement of the wider ‘balanced regional development’ objectives of the NPF. The significant population targets for the four cities outside of Dublin (to respectively increase their population by 50% by 2040) cannot be met in a sustainable way through complete reliance on greenfield expansion. The creation of attractive places of high urban quality that can act as economic drivers for the wider region require a shift away from a solely

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<sup>12</sup> NPF ‘National Strategic Outcome 1’ P.139

suburban-style expansion to a more mixed and compact urban form, which will include a broad range of densities appropriate to the particular context.

### **Identifying barriers to delivery**

Any potential proposals to accelerate the effort must also identify and address the barriers to implementation. Data from a number of sources, including the 'Housing Supply Coordination Task Force for Dublin'<sup>13</sup>, have identified a large quantum of planning permissions for higher density urban-based apartments that are not proceeding to construction. While compact growth can be delivered with a range of building typologies and is not confined just to apartment development, the recent experience of the slow uptake of apartment planning permissions is important to consider. This slow uptake of urban housing permissions has a number of causes ranging from land speculation, development financing challenges to increasing construction costs and the financial viability of higher density schemes.

The challenges and barriers to delivering compact growth often focus on the up-front cost differential when compared to delivering greenfield suburban development on the periphery or at the edge of our cities and towns. These cost differences include site costs (centrally-located sites are often smaller offering less economy of scale, may have complex issues relating to access, land ownership, servicing, contamination etc.) building costs (more expensive materials/structure costs, internal circulation space requirements, fire protection etc.) and financing costs (i.e. requiring full delivery of scheme before sale or rent).

It should also be highlighted that the difference in the up-front costs differential of delivering compact growth forms of development and greenfield development do not reflect the ongoing costs of servicing greenfield developments – new water services infrastructure, new schools, roads, open space and amenities - which must be borne by the State over the longer term.

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<sup>13</sup> <https://www.gov.ie/en/publication/5b918-housing-supply-coordination-task-force-for-dublin/>

Additionally, in terms of longer-term costs, the adverse effects of urban sprawl, including increased greenhouse gas emissions, air pollution and road congestion are not generally factored in to the upfront cost calculation.

The wider societal costs and costs to individual citizens associated with increased and longer distance commuting, poor access to essential services, as well as to local communities and supports, must also be considered as part of the overall assessment when the costs and benefits of promoting infill developments are weighed against continued sprawl.

### **5.4.3 What Could a Potential Change Look Like?**

The Report of the Expert Group includes a series of recommendations in relation to compact growth, including the need for more ambitious targets given the overarching climate objectives.

#### **Stronger compact growth targets**

*Q. Should consideration be given to increasing compact growth targets for cities and settlements? Current NPF policy provides separate targets for the Cities (50%) and Towns (30%). Is there a case for amending both of these targets?*

*Q. Recognising that targets alone will not achieve the objective of compact growth, what additional measures to encourage and facilitate development within existing settlements, including opportunities for infill development, should be considered?*

#### **Changes in how compact growth is monitored**

*Q. What changes could be made in this area to improve the measuring and monitoring of compact growth?*



The recent publication of the Residential Zoned Land Tax (RZLT) maps presents a major opportunity to improve the monitoring and tracking of the servicing requirements of urban land<sup>14</sup>.

*Q. How best could this national-scale, up-to-date mapping on the serviced status of zoned land be used to target infrastructure upgrading?*

### **Compact Growth – Public Acceptance**

The report of the Expert Review group included a recommendation to consider “*greater investment in advocacy to generate a wider understanding of the potential of good spatial planning to benefit the common good.*” While members of the public may agree that a more compact form of growth for our towns and cities is preferable to urban sprawl, the practical implementation of specific measures to achieve these aims are often resisted at a local level.

*Q. How could a public conversation on the benefits of a more compact form of growth be facilitated?*

### **Measures to address the balance**

At present, a compact, infill urban development proposal is often treated no differently from a greenfield development, despite the benefits in terms of compact growth.

*Q. Should a rebalancing of some of these factors be considered to reflect the longer term benefits of compact growth?*

*Q. Should a more proactive, plan-led approach to identifying infill sites in development plans, and the measures needed to facilitate their development, be considered?*

*Q. What more can be done to identify and prioritise specific infrastructure projects which may be necessary to enable compact development in cities and towns?*

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<sup>14</sup> The Government’s *Housing For All – A New Housing Plan for Ireland* proposed a new tax to activate vacant land for residential purposes - the Residential Zoned Land Tax (RZLT) – which was introduced by the Finance Act 2021. The process to map land to which the tax applies is underway and the tax will be payable from 2024

## 5.5 Digitalisation

### 5.5.1 What Has Changed?

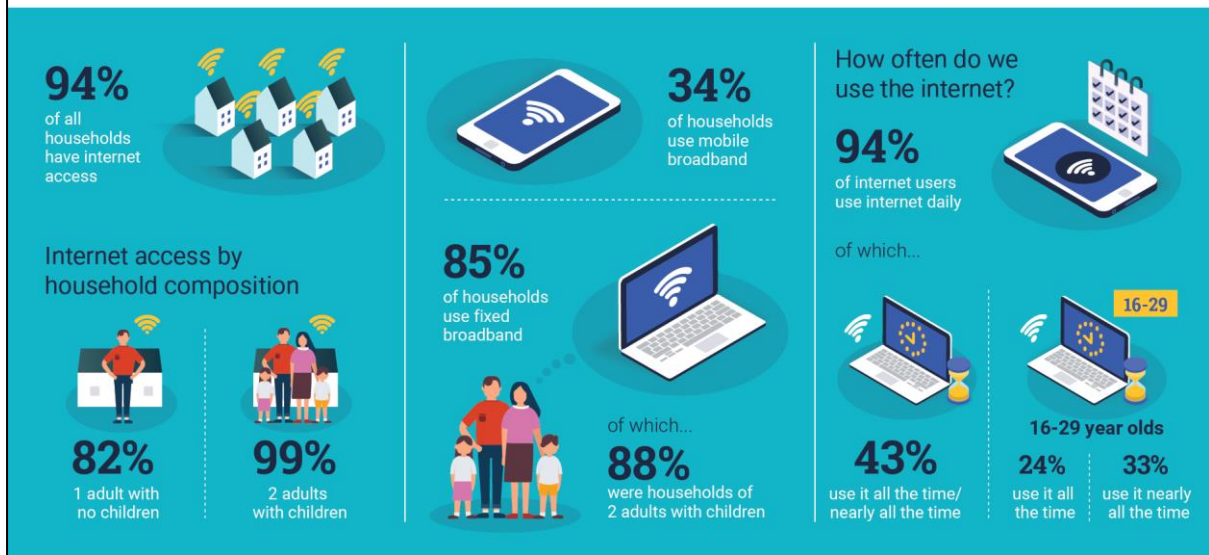
The digitalisation of society has continued apace since the publication of the NPF in 2018. Advances in technology and improvements in connectivity, particularly in rural areas, have changed how we live and work, opening up new opportunities through enhanced access to education, goods and services.

The advent of digital participation, enabled by technology, has also reduced the need to travel long distances, delivering efficiencies for both citizens and businesses alike, and has mitigated the traditional challenges of peripherality. This has the potential to deliver broader societal benefits in terms of increased labour market participation, reduced urban congestion, lower emissions, as well as time savings that can improve people's quality of life.

Notwithstanding these benefits the shift to digital, and associated activities such as remote working, has also posed challenges for the centres of our towns and cities, diverting a certain proportion of retail expenditure online and affecting footfall in areas which depend on workers for passing trade. These changing dynamics could potentially make it more challenging to develop our cities and towns to sufficient scale and quality to be drivers of national and regional growth, and focal points for investment and prosperity.

The CSO's *Internet Coverage and Usage in Ireland 2022* provides useful insight into the current level of digitalisation across society. Some key statistics are set out below.

# Internet Coverage and Usage 2022



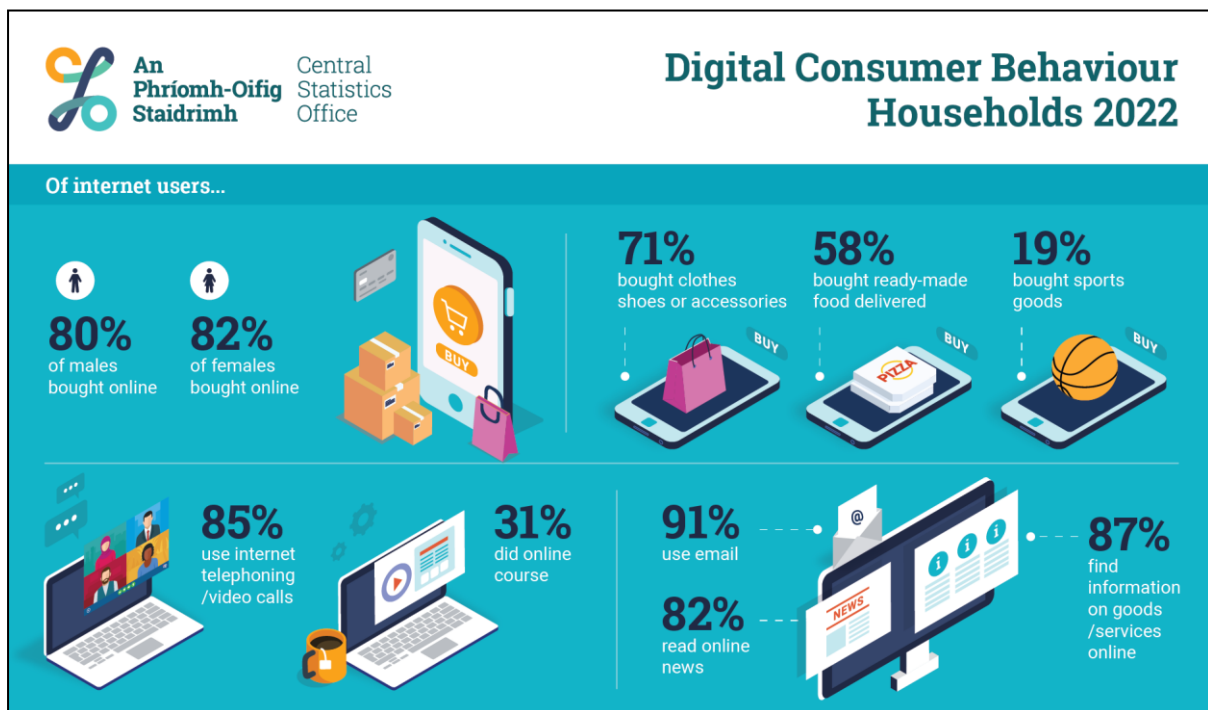
Source: CSO

The data also highlighted that internet access via fixed broadband was significantly higher in Dublin (92% of users) than in the Border (77%) and Midlands (79%), underlining the importance of initiatives like the National Broadband Plan to continue to address such regional disparities.

Another notable finding is the significantly lower level of internet usage among the over 75's. Given people in Ireland are living longer, this highlights the need to ensure that public services remain physically accessible in our urban centres for those who may be at risk of digital exclusion.

While the growth of digitalisation has been evident for a number of years, it accelerated exponentially during the Covid-19 pandemic. Following the introduction of public health restrictions in early 2020, many workers found themselves working remotely and contributing to virtual meetings and cloud-based projects for the first time. CSO's report on *Household Digital Consumer Behaviour 2022* indicates that digital services now play a very significant role in daily life in Ireland, with large numbers of people not only buying goods online, but also using the internet to communicate, seek out news and information, as well as undertake education. This societal shift to digital has the

potential to disrupt traditional business models, particularly in the retail sector, which has specific implications for the centres of our towns and cities.



Source: CSO

Since 2018, digital technology has also advanced both in terms its capability and reach. This is particularly evident in sectors that traditionally have had lower reliance on digitalisation, such as agriculture, while in the public sector, new digital innovations continue to be rolled out, such as ePlanning. The practical impact of digitalisation will continue to increase in the years ahead and this will pose both opportunities and challenges which will require a coherent and informed policy response.

*Harnessing Digital – The Digital Ireland Framework* seeks to position Ireland as a digital leader, driving and enabling digital transformation across the economy and society. The strategy identifies four dimensions with associated targets and work streams including the digital transformation of business, enhanced digital infrastructure and connectivity, increased digital skills, as well as the further digitalisation of public services. The framework is complemented by the Government’s *Digital Connectivity Strategy for Ireland* which focuses on enabling telecommunication infrastructure and services that delivers digital connectivity.

One element underpinning the digitalisation of society is the supporting physical infrastructure, including data centres. The Government recognises that data centres provide the foundation for almost all online aspects of our social and work lives<sup>15</sup>. In July 2022, it signalled its clear preference for data centre developments that are associated with strong economic activity and employment, which make efficient use of the electricity grid, and demonstrate renewable energy additionality or co-location of renewable energy supply. In particular, such development can be considered appropriate to regional locations, where aligned with the National Planning Framework and Regional Spatial and Economic Strategies, which is intended to embed the technology sector in locations and communities that can benefit from this investment, employment and spillover effects.

### **Impacts of Digitalisation on the Future of Work**

The world of work has undergone significant change since 2018 and continues to evolve. This has been influenced by a number of major events including:

- the Covid-19 pandemic and the increased prevalence of remote working;
- Industry 4.0, i.e. increased digitalisation and use of advanced technologies in industry;
- Brexit.

The CSO's *Labour Force Survey Employment Series* indicates that in Q3 2022, persons who usually work from home accounted for 22.5% of those in employment, up from 7.3% in Q3 2019. The figure was even higher in Dublin at 30%. This extensive adoption of remote working, as enabled by increased digitalisation, has arguably been one of the greatest changes to how work is now carried out. In response, Government has developed a new policy and legislative framework to ensure that remote work remains a permanent feature in the Irish workplace in a way that maximises its economic, social and environmental benefits.<sup>16</sup>

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<sup>15</sup> *Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy, July 2022*

<sup>16</sup> *Making Remote Work: National Remote Work Strategy and Work Life Balance and Miscellaneous Provisions Act 2023*

The Government's *Trade and Investment Strategy 2022 – 2026: Value for Ireland, Values for the World* recognises the potential impacts of technology and remote working on the world of work and the associated opportunities and threats that arise. Citing as an example that work previously done in an office in Dublin can now be carried out by the same executive in Ballina, it cautions that equally this work could also be done abroad in Barcelona. Accordingly, the strategy emphasises the need to ensure that Ireland is an attractive place for people to live. This aligns with the NPF's stated national core principle to ensure a high standard quality of life as well as environmentally and socially sustainable housing and placemaking through integrated planning and consistently excellent design. This is further supported through the NDP by both the Rural and Urban Regeneration and Development Funds, which enable investment in creating attractive, functional and sustainable places.

The Government recognises the scale of transformation posed by digital technologies and has adopted focused policies to ensure that the State will be at the forefront of technological adoption<sup>17</sup>. The digitalisation of manufacturing presents opportunities to enhance competitiveness and productivity, while improving sustainability and driving innovation across the value chain through new goods and services. However, equally it could have a significant disruptive effect on the labour market and traditional employment roles through a reconfiguration of demand for certain skills and professional knowledge.

### **Digitalisation to effect Balanced Regional Development**

The effects of this change has the potential to impact on regions in different ways. Smart specialisation and clustering policy provides a means to prepare and benefit from this change. Smart specialisation is a place-based innovation policy, aimed at promoting regional innovation and economic transformation by helping regions to focus on their key sectoral strengths. This may include unique characteristics or capabilities that provide advantages to that region in certain sectors. For example, this might include areas such as renewable energy, medical technologies, biopharma or ICT. It requires higher education, research organisations and business, along with

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<sup>17</sup> Ireland's Industry 4.0 Strategy 2020-2025 and AI - Here for Good A National Artificial Intelligence Strategy for Ireland

government departments and agencies, to identify these strengths, build on competitive advantages and prioritise support based on where local potential and market opportunities lie. This aligns with the NPF's focus on cities and regional centres as key drivers of sustainable growth. Smart specialisation also strengthens the relationship between the nine DETE Regional Enterprise Plans, the Regional Spatial and Economic Strategies, and national enterprise and innovation policy.

In addition, the Department of Enterprise, Trade and Employment intends to devise and introduce a centrally coordinated, cross-Government approach to clustering in 2023 that will encourage the formation and strengthening of national cluster organisations, leveraging the benefits of proximity and co-location to boost productivity. The identification of priority areas for enhanced clustering will be underpinned by an assessment of competitive strengths and potential opportunities against a range of factors, including the scale of potential impact, innovation intensity and research capability, as well as market direction.

Clustering policy offers the opportunity to contribute to balanced regional development by providing the infrastructure for regional collaboration and innovation<sup>18</sup>. It also recognised that clusters of national significance based in regional locations housing an agglomeration of industry could enhance Ireland's attractiveness for investment. National Strategic Outcome 5 of the NPF, A Strong Economy Supported by Enterprise, Innovation and Skills supports competitive clustering in key sectors and activities through collaborative actions at regional and local level, by realising a significant uplift in the performance of indigenous enterprises in terms of innovation, export potential and productivity, supporting technology-led start-ups and by attracting further investment to the regions.

It will be important to examine the alignment between national clustering policy and the spatial development strategy of the NPF, in the context of enabling the sustainable development of each of the cities as economic drivers in their respective regions.

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<sup>18</sup> (Grant Thornton); Department of Enterprise, Trade and Employment, [Development of an Evidence Base to Support the Development of a National Clustering Policy and Framework](#), 2022.

The interaction between employment and housing is of critical importance when considering the most sustainable approach to land use planning, and the changes to working practices and commuting patterns resulting from increased digitalisation require particular focus in the context of the revision.

### **Retail in Urban Areas**

At a sectoral level, retail is one segment of the economy where the impact of digitalisation is becoming increasingly apparent. As one of the largest sectors of employment in the country the importance of retail is further accentuated by the fact that these jobs are distributed across all regions, in both urban and rural areas, thereby delivering increased social and economic impact. This underlines the sector's critical importance to local economies and the vitality of our towns and villages. However retail is evolving, with increased digitalisation in stores, and a significant proportion of trade now taking place online. Accordingly, the retail jobs of the future will likely require different skillsets. This could impact on the number and distribution of jobs in the sector, and pose new challenges in terms of urban land use and creating economically sustainable places.

It is a core principle of national retail planning policy that retail development should be appropriate to the scale and function of the settlement in which it is located. Enhancing the vitality and viability of city and town centres in all their functions through sequential development is an overarching objective. The NPF revision will examine whether any changes are required in the context of the evolving retail landscape and whether there are new or emerging considerations that need to be reflected.

A key challenge for the planning system is to enable business to adapt to an increasingly digital future while retaining and supporting the core function of our urban centres and the indispensable contribution that they make to both urban and rural life.

The Retail Planning Guidelines for Planning Authorities (2012) contribute to this end by:

- Ensuring that retail development is plan-led.



- Promoting city/town centre vitality through a sequential approach to development.
- Securing competitiveness in the retail sector by actively enabling good quality development proposals to come forward in suitable locations.
- Facilitating a shift towards increased access to retailing by public transport, cycling and walking, and
- Delivering quality urban design outcomes.

## Implementation

Several funding initiatives are in place to support enterprise to seize the opportunities arising from digitalisation. The Digital Transition Fund helps eligible businesses to develop a roadmap for digital transition and supports those seeking to invest in new or significantly improved production and service delivery.

At national level, the *Disruptive Technologies Innovation Fund* encourages collaboration and innovation in the development of disruptive technologies targeted at tackling national and global challenges. It encourages projects that complement digital transformation and innovation, two key focuses of the new *White Paper on Enterprise*.

As of Call 5, a total of 91 projects involving 340 partners located across 18 counties have been awarded almost €306 million in funding under DTIF. The majority has been allocated to projects outside of Dublin, with projects in Cork, Galway, Limerick and Waterford accounting for almost 46% of total funding awarded to date. The linkages that the fund creates between SMEs, MNCs and research bodies enables the development of ecosystems which can help firms to become embedded in the value chains of FDI-intensive sectors, leading to positive spillover effects in the domestic economy and aiding regional development. A sixth call of the fund opened earlier in 2023 and successful projects will be announced in due course.

It will be important that future job creation aligns as closely as possible with NPF and RSES strategy and it may be necessary to prioritise state investment in a manner that supports job creation in regions which are currently underperforming. This could assist

the realisation of NPF strategy and counteract unsustainable settlement patterns resulting from a regional imbalance in the spatial distribution of employment opportunities and certain high skilled roles.

In the local government sector, ePlanning has delivered efficiencies for applicants and greater convenience for the public by making it easier to engage with the planning system. The ePlanning Portal allows for the following planning functions to be undertaken online:

- Lodging of planning applications and associated fees
- The making of submissions and observations on planning applications
- View and make submissions on local authority own developments 'Part 8'

As of early September 2023, the portal has been rolled out to 23 Local Authorities with the remaining eight authorities to be integrated in the coming months. Feedback to date from local authorities in which the portal is available indicates that about half of all planning applications are now being made online with a similarly high rate of online public submissions.

In addition to increased convenience and cost savings, the online facility also brings consistency to the way applications are lodged and removes the necessity for scanning and printing of hardcopies both for applicants and local authority administrative staff, thereby leading to improved levels of service for service users.

### **5.5.2 What Could a Potential Change Look Like?**

**Small and medium-sized enterprises (SMEs)** constitute the vast majority of businesses and can be found in almost every community in Ireland. Planning policy which supports this sector to meet the challenges of digitalisation can make a significant contribution to the achievement of balanced regional development by enabling firms to drive productivity and innovation, open doors to new markets, and better understand and respond to their customers' needs.

A proactive plan-led approach can help tackle regional disparities and prevent the creation of a two-speed economy characterised by pockets of digital exclusion and inequality of opportunity.

*Q. How can the revision to the NPF support the continuing development of the digital economy, facilitate improved connectivity and capacity and enable digital adoption in all regions?*

*Q. Are new approaches required to respond to the new and emerging trends in relation to the distribution of jobs and services? How should these trends be considered in the context of planning for housing and the objective of influencing settlement and commuting patterns in the interest of reducing carbon emissions?*

*Q. In response to the acceleration of digitalisation across society and the advent of online retailing in particular, what adaptation measures are needed to assist our towns and cities to maintain their vital social and economic roles within the fabric of the community?*

*Q. How can smart specialisation can be utilised to create stronger regions, supported by a hierarchy of vibrant and self-sufficient urban centres which can thrive outside of Dublin's sphere of influence, and which are not characterised by issues such as dereliction, long distance commuting or outward economic migration?*

*Q. What measures need to be taken to standardise and streamline our approach to capturing and monitoring spatial data as part of a wider digitalisation process?*

## 5.6 Investment and Prioritisation

### The Importance of Aligning Investment with the NPF

At a national level the NPF and the NDP 2021-2030 combine to form Project Ireland 2040. The NPF sets the vision and strategy for the development of Ireland to 2040, while the NDP provides the supporting capital investment plan for the period 2021-2030. This ensures effective co-ordination between the NPF and sectoral budgetary plans across Government, with a focus on the shared National Strategic Outcomes of the NPF and NDP.

With previous public investment plans the link to the national spatial strategy was weak or absent. This was due to a number of causes including a lack of prioritisation in the spatial strategy itself, as well as the lack of a mechanism to ensure that local development plans were aligned with the national plan.

The NDP sets a framework for the investment of €165 billion with a focus on housing, climate, transport, healthcare and jobs growth. In addition to these sectoral investment priorities, the NDP for the period 2021-2030 established two place based funds with an allocation of 3 billion. The Urban Regeneration and Development fund (URDF) supports the NPF's growth enablers for the five cities and other large urban centres, while the Rural Regeneration, and Development Fund (RRDF) invests in rural areas.

In terms of governance, the Project Ireland 2040 Delivery Board was established in 2018 to oversee alignment between the strategy and the investment plan. The Delivery Board is chaired by the Minister for Public Expenditure, NDP Delivery and Reform and comprises membership from key infrastructure departments and five external board members.

A central benefit of ensuring alignment of the spatial and investment plans is that delivery of housing, jobs and infrastructure can be aligned and in close sequence rather than consecutively with potentially long delays in between. The revision to the NPF must involve an examination of the effectiveness to date of this alignment and whether the interaction between planning, prioritisation and investment requires to be strengthened.

## 5.6.1 What Has Changed?

### Alignment of NPF/NDP

The years since the adoption of the NPF has seen many of the major infrastructure providers publishing their own capital investment plans and strategies which they have sought to align with NPF spatial priorities.

A report was published by Government in 2021 to assess the effectiveness of this alignment - ‘*Assessing the alignment of the National Planning Framework and National Development Plan*’ (2021). The report noted that the alignment of investment plans with any new spatial strategy takes time and that many of the larger projects that will be delivered in the early years of the NDP are projects that were in planning long before the new spatial strategy was articulated in the NPF. It was acknowledged that significant work has been undertaken by government departments and state agencies to align sectoral plans with the NPF targets.

The report highlighted a number of risks in some cases to the effectiveness of this alignment:

*“There appears to be a lack of explicit consideration in project selection processes of the investment needs required for Ireland’s regional cities to grow in line with NPF targets”;*

and also a tendency toward mistaking a general spatial spread of investment as meeting the targeted prioritisation required by the NPF:

*“There is a risk of Departments or Agencies assuming that a general regional spread of investment represents alignment with the NPF in and of itself, as opposed to an explicit recognition and focus on achieving the specific growth targets set out in the NPF, in particular the greater levels of growth in our regional cities of Cork, Galway, Limerick and Waterford.”*

It is also clear from the review of the NDP undertaken in 2021 that while capital investment has been spread across the regions, regional cities had a lower share of larger investment projects (€20 million + and €100 million +), despite their critical role

in the achievement of the NPF strategy. This may reflect the time taken to align sectoral budgets and strategies.

### **Funds linked to the NPF**

The Urban Regeneration and Development Fund (URDF) and Rural Regeneration Development Funds (RRDF) are the flagship €3 billion investment programmes of Project Ireland 2040, established to support National Planning Framework objectives through the sustainable regeneration and rejuvenation of Ireland's five cities and large towns (URDF) and smaller towns (RRDF).

Through the URDF, funding is being targeted to support innovative projects that enable new housing, commercial, community and other development to be delivered within the existing built-up footprints of our cities and towns and to create attractive and vibrant places for people to live and work, as well as to invest in and to visit.

The URDF is currently providing assistance to 132 regeneration proposals which comprise almost 400 sub-projects spread all across the country. A recent funding call of URDF was launched to specifically address long term vacancy and dereliction across cities and towns and to bring existing long term vacant and derelict buildings and sites into use for residential and other purposes.

Many of these projects have the potential to be transformative regeneration interventions in cities and town across the country. Projects are at various stages of completion, some in planning and design, some under construction and some completed recently. The full impact of the projects, with full completion across the country, will still take some years to be realised<sup>19</sup>.

## **5.6.2 Policy Issues**

### **Aligning investment related to supporting the delivery and implementation of spatial priorities**

The recently published '*National Risk Assessment - Overview of Strategic Risks*' (2023) specifically identified the challenges of addressing infrastructure requirements

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<sup>19</sup> Details on URDF projects are available at <https://planning.geohive.ie/>

to support necessary housing supply as a significant national risk, highlighting the critical importance of this issue:

*“Delivering a step change in housing supply is complicated by the other significant challenges facing our country, including addressing climate change, the transition to a low carbon economy, increasing population and changing demographics, and the need to **address other infrastructure needs such as transport, water and electricity**, all within the context of national and EU obligations, and the overall resource capacity of our country.”*

As set out above, an important aspect of the NPF is ensuring spatial alignment with the NDP investment priorities. The revision of the NPF provides an opportunity to assess how effective this alignment has been and whether alignment can be strengthened to deliver on the Objectives of PI2040.

A number of key recommendations of the Expert Review Group focussed on infrastructure delivery more generally and the roles and responsibilities of the players involved. One recommendation suggested the identification of principles for identifying priority locations for strategic infrastructure.

#### **Expert Review Group - 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.

### **Addressing the Infrastructure Deficit**

The period following the economic crash saw a sustained period of underinvestment in national infrastructure across many sectors. The rapid recovery since and the strong population and employment growth has led to a period of catch-up with many deficiencies in infrastructure still evident. The revision to the NPF is an opportunity to bring a greater clarity to the identification of major gaps in infrastructure delivery which are preventing the securing of the spatial objectives of the Framework and the prioritisation of these projects.

## Cross Government Policy Alignment and Delivery

The report of the Expert Review Group also identified a number of practical implementation considerations with regard to infrastructure delivery which should be addressed as part of the revision. It was suggested that greater clarity should be provided in the NPF around the roles of all key bodies involved in infrastructure planning and delivery, in particular given the different levels of government involved, from national to regional to local including a wide variety of state agencies.

### **Expert Review Group - 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.

### **Expert Review Group - 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.

The Expert Review Group also recommended the consideration 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. It is noted in this regard that there is currently a cross government co-ordination group in operation to oversee the delivery of the PI2040.

## Monitoring and Review

The National Investment Office currently monitors strategy and investment alignment by region and city on an annual basis in the Project Ireland 2040 Annual Report. The



Office also manages the ‘MyProjectIreland<sup>20</sup>’ mapping tool and ‘Investment Tracker’ to report on consistency and alignment within Project Ireland 2040. This ‘Investment Tracker’ is drawn from data provided by relevant Government Departments and agencies and focuses mainly on projects and programmes with costs greater than €20 million.

The Expert Review Group also recommended strengthening the overall monitoring process with the establishment of a dedicated unit to monitor progress against targets and which would also go further and identify challenges in the implementation process.

#### **Expert Review Group - 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.

### **5.6.3 What Could a Potential Change Look Like?**

In addressing a number of the recommendations of the Expert Review Group, new provisions in the NPF could explore ways of strengthening the aligning of NPF/NDP interaction in the following three broad areas.

#### **Project Selection and Prioritisation**

*Q. Should the approach to the identification and prioritisation of key enabling infrastructure required to deliver on NPF objectives be reviewed as part of the revision?*

*Q. How should the revision to the NPF address the prioritisation of infrastructure projects which are essential for meeting climate action targets?*

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<sup>20</sup>Available online at: <https://www.gov.ie/en/collection/f828b-myprojectireland-interactive-map/>

## **Institutional arrangements – roles and responsibilities**

*Q. How could the process for ensuring alignment between the sectoral strategies of Departments and Agencies and the objectives of the National Planning Framework be improved?*

## **Monitoring and reporting**

*Q. In order to strengthen monitoring of the Framework should Departments which have larger demand-led investment programmes be required to monitor and report on the share of investment for each of the three regional assemblies and five cities?*

## **Better Data**

*Q. How could the monitoring and tracking of infrastructural investment be improved to ensure that it is made in the right place at the right time? What current gaps exist in relation to data and mapping that act as a constraint in this area?*

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