



**Unique Reference Number:** DHLGH-C1-159

**Status:** Approved

**Submission:** Reflections on Draft First Revision to the NPF

**UID:** 590

**Author:**

International Centre for Local and Regional Development (ICLRD)

**Consultation:**

Draft First Revision to the National Planning Framework

**Date Created:** 12.09.2024 - 14:51

---

## Observations:

### 1. The Vision

**Chapter:** 1. The

Vision

1. Chapter 1 sets out the vision for the updated NPF, recognising the need to alter population projections both nationally and across the three regions. As a framework, it notes its role as a “high level strategic plan for shaping the future growth and development” of the country to 2040. Concerningly, it goes on to references how the framework sets in train a process “by which more detailed planning documents must follow” – in terms of spatial planning, infrastructure planning and social and economic development. This immediately raises questions around how many plans we need – given what already exists across the hierarchy of the planning system.
2. Chapter 1 notes the NPF’s provision for “more strategic and coordinated planning of cities and large towns across local authority boundaries. This recognition of the functional of our cities and towns, which doesn’t recognise borders, is to be welcomed.
3. Chapter 1 clearly places the five cities of Dublin, Cork, Limerick, Galway and Waterford at the heart of this framework. While this focus on the cities is to be welcomed, it does beg questions around:
  1. The geographical spread of the focus of this framework; what happens above the line stretching from Dublin to Galway?
  2. Why has this framework decided to remove reference to designated regional growth centres – given its continued focus (albeit somewhat diluted) on balanced regional development - outside of named centres such as Athlone, Sligo, Letterkenny-Derry, and Drogheda-Dundalk-Newry?
  3. Why is there a continued resistance to the formal designation of the North West City Region, centred on Letterkenny-Derry-Strabane, as a key city-region on a par with Limerick, Waterford and Galway? As the fourth largest agglomeration of the island of Ireland, and recognised by both Governments on this island since 2016 (via the NSMC) is this not critical to a committed approach to balanced and sustainable regional development?

4. Added pressures will come from an ageing population and associated health and service needs that come with that; a decline in average household size which in turn raises questions about the suitability of the current housing stock and the type of dwellings that we should be constructing over the medium-term; and the distribution of employment growth which, in turn, is so closely related to housing pressure points.

4. This approach is particularly disheartening given the evidence available which clearly shows that growth is still significantly weighted to the east of the country, and regional disparities are continuing to widen. The 2022 EU Regional Competitiveness Index, for example, clearly highlighted the scale of regional imbalance across Ireland's three regions and gives further insight into the recent categorisation of the Northern and Western Region as a 'lagging region' and 'region in transition'. Of the 234 EU regions examined in the index, the Northern and Western Region ranked 113th and underperformed in areas relating to infrastructure, innovation capabilities, market size and business sophistication. This picture is not new but its longevity and persistence is of growing concern in light of current policy priorities to balanced regional development

5. The reference to the 2023 Expert Group Review, and specifically what is required to clarify and strengthen the process around implementation is welcomed; acknowledging this was a significant shortfall of the initial six years of the NPF.
- 

## 2. A New Way Forward

**Chapter:** 2. A New Way  
Forward

1. The assertion in Chapter 2 that Sligo in the North West and Athlone in the Midlands fulfil roles such as being accessible centres of employment and services that could be a focal point for investment and having wide regional influence is not at all apparent, and needs backing up with evidence. In the case of the North West, the inclusion of both Sligo and Letterkenny as having a key regional role in National Policy Objective 5 is considered to be a better proposition with regards to regional parity and balanced development.

2. The ICLRD fully welcomes the recognition given to the cross-border networks of cities serving both the North-West and the Dublin-Belfast Corridor, including their growth potential and contribution to balanced regional development. While the framework goes on in later chapters to speak to the supports to be provided to the Dublin-Belfast corridor to realise this potential, this is noticeably lacking for the North West agglomeration.

3. The ICLRD fully concurs that as a society there is a remarkable overdependence on cars, with ongoing difficulties in providing good public transport – not least given current settlement patterns, particularly in more rural areas. This is borne out by ICLRD's own research programme, InPLACE, which will be published imminently.

4. In building stronger regions, it is notable that it will be the Regional Assemblies through the RSES that will be charged with defining the key role of regional growth centres – some of which are mentioned in this report. Unlike the original NPF document, there is no dedicated listing and associated analysis of regional growth centres in this draft revision. Are the originally named regional growth centres still defined as such in this updated NPF? Or is it now the responsibility of the Regional Assemblies to both identify these centres, evidence their selection and define their key roles? This is not at all clear.

---

### 3. Effective Regional Development

#### Chapter: 3. Effective Regional Development

3.1. Chapter 3 highlights the 'significant progress' made since the adoption of the NPF in 2018 in terms of the introduction of institutional and policy measures aimed at supporting effective regional development (i.e. the RSES, Regional Enterprise Plans and National Smart Specialisation Strategy for Innovation 2022-2027). However, these policy measures have not, to date, being backed up by the required capital investment or the cross-departmental/ whole-of-government co-ordination across infrastructure projects and the NDP as recommended by the Expert Group for balanced regional development. This investment is critical to achieving the more sustainable growth patterns called for in the regions and cities.

3.2. The ICLRD welcomes the commitment towards self-sustaining rather than commuter-driven activity across the regions, and the acknowledgement of the opportunities provided by hybrid and remote working. Ongoing advances and adoption of digital technologies is critical in this regard, and the publication of the *Harnessing Digital* strategy, and the *Local Government's Digital and ICT Strategy 2030* are positive developments in this regard.

3.3. In considering the need for a more holistic approach to ensure that residential and employment development is better integrated, and the need for more sustainable modes of transport – rather than unsustainable commuting patterns – there is a need also to place a greater emphasis on both the risks to health of habitual long commutes and environmental dis-benefits.

3.4. Chapter 3 notes the challenges facing the Northern and Western region in terms of sustainable growth and development, and its poor performance over the first 6 years of the NPF roll-out. By their nature, border regions in general experience higher levels of deprivation, peripherality and health inequalities as a result of their distance from the centres of decision making and the frequent experience of historical underinvestment. This is compounded by out-migration ('brain drain') and, in the case of Ireland/ Northern Ireland, has been further exacerbated by the Troubles and, more recently, Brexit. There is a growing argument for a period of positive discrimination towards the Northern and Western region – with a focus on providing additional funding and resources in support of moving towards more regional parity.

3.5. With the population of Ireland expected to grow by an estimated 950,000 people over the next fifteen years, it is essential that the development required to accommodate this growth is not confined to the eastern corridor. The Greater Dublin Region must be developed in tandem with the regions – thus activating the potential of rural Ireland and the island as a whole. The sustainable growth of rural Ireland will support the urban engines of growth on this island.

3.6 The regions outside of Dublin offer a range of growth and investment opportunities; latent assets yet to be untapped which have the potential to offer competitive advantage. In planning for, and investing in, effective regional development, there is a need to focus on the functionality of regions, with local government encouraged to strategise accordingly. This may require operating outside of defined administrative boundaries; instead focusing on defined functional spaces – for which there is a growing evidence-base to support such actions.

3.7 Key to realising the competitive advantage of regions is improving connectivity and building the infrastructure of the regions; particularly in the North West and central border areas. Firstly, this includes recognition of and the continued expansion of air and port access - Ireland West Airport Knock, Derry City Airport, Port of Derry, Port of Killybegs; upgrade of the road network from Dublin-Letterkenny/Derry and Galway-Sligo/Letterkenny; and improved broadband access and speeds incl. ensuring greater benefits stemming from Project Kelvin.

3.8. As raised in the original consultation on the 2018 NPF, terminology and language is key in any framework document. On page 35, the section on the 'North West' focuses on the potential role of Sligo as a regional centre of growth, while the section on 'Donegal' focuses on the North West City Region and the interdependencies on this functional, cross-border city-region. This has the potential to lead to confusion.

3.9. The Chapter speaks to the collaborative approach of the North West Strategic Growth Partnership and the scope to further reflect this approach in a regional and local spatial planning context. Is the development of a MASP for the North West City Region not the most appropriate – and consistent - mechanism through which to do this? This would match the call for a coordinated strategy for Sligo to be developed at settlement level to ensure the sustainable development of the town. As has been advised by the North West Regional Development Group, there is an ambition across the councils of the North West City Region to jointly prepare a metropolitan area spatial strategy – building on the scoping paper developed in 2021/22.

3.10. The general principle of 'effective regional development' requires, and commits, government to recognise the unique spatial geographies of the various regions across the State, and the requirement for a bespoke approach to regional challenges and opportunities across Ireland. The ICLRD calls on the Government to designate the North West City Region (centred on Letterkenny-Derry-Strabane) as a core metropolitan area – thus improving the spatial distribution of the effective growth strategy being pursued by the Government; with a Metropolitan Area Strategic Plan to be prepared through the RSES process. This City Region is both a national and sub-regional economic driver for both jurisdictions on the island of Ireland

3.11. The inclusion of a case study on the Atlantic Economic Corridor is welcomed. Geographically, the span of this corridor should be extended to include Derry. Equally there is a case to be made to extend the Dublin-Belfast economic corridor to the South-East as far as Waterford.

3.12. In terms of planning and place-making policy, the ICLRD welcomes the commitment to consolidating the development of places that grew rapidly in the past decade or so. The need for such retrospective action is also evidenced in the forthcoming ICLRD research report on commuting from small rural towns (InPLACE study).

---

## **4. Making Stronger Urban Places**

**Chapter:** 4. Making Stronger Urban Places

4.1. Many of Ireland's urban areas are characterised by sprawl – low-density, car-dependent settlements surrounded by new fringe housing estates often not in scale to the actual needs of the community or indeed having the necessary additional capacity in transportation, education, health services, community facilities etc.

4.2. Added to this is the challenges posed by an ageing population which has far-reaching implications for all aspects of society

4.3 A lifelong cycle of health as a concept needs to underpin the NPF's approach to health and wellbeing. A more comprehensive analysis of the role of planning in health outcomes is required. This is particularly important in areas of high urban (and rural) deprivation where health inequalities are more concentrated. While this is a national issue, particular reference should be made to the evidenced impact of the border on health and wellbeing.

4.4 Good spatial planning helps improve the 'liveability' of areas (Barton 2009). Northern Europe provides some inspirational examples of how environmental sustainability and supporting healthy lifestyles can come together through spatial planning and place-making. Places must have facilities that are appropriate for their demographics – from children through to the elderly.

4.5. In terms of place-making, there is a need for the NPF to be aligned with other investment strategies and policy frameworks to maximise synergies and benefits for improving place-making and service delivery. This should be considered vertically and horizontally. Vertically, in terms of creating a 'golden thread' alignment from national outcomes to departmental/organisation teams responsible for shaping places and designing/delivering public services. Horizontally, in terms of working across professional and sectoral boundaries, to align spatial development strategies with social well-being strategies

4.6. The chapter briefly references the role of new governance arrangements in growing Ireland's three regions. This is critical to effective implementation of the priorities of the NPF – and as such, warrants further detail and clarification (as was called for by the Expert Review Group and more recently the OECD report on regional attractiveness).

4.7. The failure of the NPF to name any of the larger regional growth centres (outside of Sligo, Athlone and the cross-border agglomeration settlements of Derry-Letterkenny and Drogheda-Dundalk-Newry) and clearly define the role they are to play in effective regional development is very disappointing. The naming of large towns – and determination of their role and function and future growth – has been left to the Regional Assemblies and the RSES's; and approach that risks returning to the model of the NSS and 'one for everyone in the audience' because of the political nature of these bodies.

4.8. The chapter speaks to the opportunities for other urban centres (outside of the five cities) – and in particular well connected towns – to accommodate employment growth. Where there remain significant challenges around connectivity in Ireland, including around mode of connectivity, there is a key question in this context as to what is meant by well-connected?

---

## 5. Planning for Diverse Rural Places

**Chapter:** 5. Planning for Diverse Rural Places

5.1. Rural – or small – places do matter and they can make a major contribution to effective balanced development. The ICLRD welcomes the NPF's commitment to the regeneration and repopulation and development of rural towns and villages. There is a need to address this more explicitly, particularly in how to reverse rural depopulation. Actions in this regard must recognise the individuality of place, the latent potential of local assets, the need to empower and build communities and, in the context of the border region, address the challenges posed by Brexit – known and yet unknown. Lack of infrastructure capacity – such as wastewater – significantly hinders the growth of rural areas.

5.2. Rural Ireland is a hot-bed of talent and creativity; with communities having a strong sense of pride and 'belonging'. Some direction and guidance on the role of towns and villages relative to rural development could provide the basis and platform for a more sustainable model for rural Ireland. This is strategically significant in light of the upcoming review of *Our Rural Future*.

5.3. The chapter acknowledges the broad and complex challenges facing rural areas – and that is not only one type of 'rural', rather that each area is distinct and thus, requires a unique approach to any regeneration or revitalisation programme. Any initiatives to strengthen and revitalise towns and villages must do so as multi-functional places, with sustainable transport infrastructure. Together this will enable citizens to enjoy a better quality of life, support the rural economy and reduce car-based travel.

5.4. There is a need to bring some of the details in this – and other chapters – up to date. The discussion on Town Centre First for example, speaking to a new package of supports to be launched in 2024 (which has already happened).

5.5. Dispersed settlement patterns and lack of sustainable transport options will make it extremely difficult for rural regions to contribute to both national carbon reduction targets and compact growth policy.

---

## 6. People, Homes and Communities

**Chapter:** 6. People, Homes and Communities

6.1. Adopting a place-based approach to future development and investment must acknowledge the functional relationships between places and the movement of people between places. *The Framework for Co-operation: Spatial Strategies of Northern Ireland and the Republic of Ireland* (2013), while non-statutory, affords both jurisdictions on the island of Ireland opportunities to work together to harness strategic development opportunities. The Framework encourages policy-makers to take account of the wider impact of their work and exploit opportunities from a broader perspective. In the context of Brexit, and the many uncertainties it brings in its wake, this document will be a key instrument in supporting both administrations to work together on those challenges mutually shared.

6.2. The referencing of the inherent links between quality of life and access/connectivity is welcomed. As is well documented, the changing nature of society has resulted in greater car dependency and reduced levels of physical activity. The NPF needs to make specific provision for the planning of 'healthy' infrastructure – whether active travel modes and/or greenways and blueways for 'down-time'.

6.3. It is clear that infrastructure deficits are undermining the overall growth potential of Ireland's regions – particularly the Northern and Western Region and the Southern Region. Infrastructure investments are key enablers to the development of quality places to live, work and study.

6.4. The lack of housing supply is pushing up costs in terms of both buying and renting property. This impacts negatively on affordability which, in turn, has implications for quality of life. It is increasingly impacting on the ability to retain young people – and is increasingly contributing to a 'brain drain' as young people emigrate. This in turn has implications for skills – and driving skill gaps. Accommodation for students is also becoming more difficult – and this is impacting on further and higher education choices and skills development. There are increasing number of students driving to/from college – giving rise to further car dependency and congestion....and universities needing to provide increased levels of car parking, an unsustainable land use.

6.5. A strong education sector within a region is central to its effective development – as an attractor of investment, an incubator for R&D, a platform for in-migration, and a nurturer of an innovation culture. There is a need for much greater collaboration between business and the education sector – universities, technological universities, colleges of further education, ETBs; indeed, even at post-primary level to highlight skilled employment opportunities locally and regionally. There is a growing need for the qualifications offered by third level institutes to reflect the needs of

employers and especially emerging growth sectors. A greater understanding of the needs of employers must take place through detailed research and communication and a more practical based education system developed that actually prepares and re-skills people for the work place

6.6 The development of further links between third level education and employers, together with mechanisms for student retention, are recognised as a priority for all regions across the State.

---

## 7. Realising our Island and Marine Potential

**Chapter:** 7. Realising our Island and Marine Potential

7.1. With the island of Ireland's prime geographical position in the resource-rich location of North West Europe, and with innovations in wind, water and wave and even algae technologies, Marine Spatial Planning will be a vital process to enable renewable technologies to shape the future energy mix and to allow the island to emerge as a renewable energy exporter. There is scope for much innovation in this sector; and the NPF has an opportunity to be very progressive in this space.

7.2. The maritime economy is a key enabler of effective regional development, especially in remote coastal communities and the islands. This is also referenced in '*Our Rural Future 2021-2025*'.

7.3. Ports play a significant role as facilitators of the regional economy, and in delivery of balanced regional development. These ports will also play a significant role in supporting offshore energy servicing and maritime tourism. Recent research by Maynooth University and Queens University Belfast for the European Parliament on the impacts of Brexit on cross-border cooperation emphasises access to a viable and sustainable energy source as critical to regional development. The advantages of ports is dependent on the necessary infrastructure facilitating in/out access. The Northern & Western Regional Assembly (NWRA) in the '*Regional Infrastructure Tracker*' (July 2024) recommends enhancing the port infrastructure of Killybegs so it can capitalise on the opportunities associated with the offshore wind energy sector and the blue economy and examining the feasibility for pursuing the delivery of Killybegs Port as part of the EU's TEN-T Comprehensive ports.

7.4. MSP will be a vital process to enable renewable technologies to shape the future energy mix and to allow the island to emerge as a renewable energy exporter.

7.5. Notable emphasis is placed on the economic potential of the marine resource. A greater balanced is needed, acknowledging planning considerations and environmental responsibilities at the marine and coastal interface and the need for a consistent approach when considering development management impacts on the marine area (a key aim of marine spatial planning).

---



## 8. Working with Our Neighbours

### Chapter: 8. Working with Our Neighbours

8.1. Having a long-term vision for the future growth of Ireland, including its inter-relationships with Northern Ireland and the U.K. on a North/South and East/West axis, is core to the achievement of sustainable balanced development.

8.2. This places further emphasis on the important role played by our ports and airports and the need for continued investment in both. Added to this, is the strategic importance of growing the all-island rail network – as per the All Island Strategic Rail Review.

8.3. The commitment to the development of the Dublin-Belfast economic corridor and the North West City Region, in terms of advancing the all-island economy, is welcomed. As previously mentioned, this does not appear to be on an equitable basis; with the discussion on the North-West focusing more of the strategic priorities of the region as per its Statement of Regional Priorities published in 2021.

8.4. Figure 8.2, under ‘coordinated spatial planning’ makes no reference to the North West, seems to ignore the strategic objective of developing a metropolitan spatial strategy for the North West City Region, building on the already published scoping paper. That the North West is reference under ‘Joint Initiatives’ misses a core objective of the responsible councils – as advised to both governments in a submission earlier this year.

8.5. The collaboration taking in place in the North west around further and higher education through the North West Tertiary Cluster is a worthy case study of cooperation between cross-border institutions and the potential contribution of this to both skills and economic development and achieving regional parity.

8.6. The section on ‘Transport’ makes reference to the draft All Island Strategic Rail Review and should be updated accordingly (as this is now finalised and adopted). This section also warrants further outline of the cross-border dimensions of transport investment planned, both in terms of rail and cross-border public transport. These are critical to addressing car dependence and future Transport-Oriented Development as highlighted throughout this framework.

8.7. The section on ‘Energy’ is of increasing importance, as is the transition to renewables. The capacity of the grid for many counties to adapt and cope with the emerging potentials is lagging; and how this is to be addressed needs further consideration. This includes in the landing of off-shore renewable energy.

8.8. It is striking in this chapter on working with our neighbours that there is no discussion on the role of data – part. in terms of the development of an all-island database. Both ICLRD and the All Island Research Observatory

have been raising this for the past three years – following Census 21 (NI) and Census 22 (Ireland) – based on previous work undertaken in building all-island datasets. With advances in technology and more sources of open data becoming available, and the growing need for sound, evidence-informed Policy, there is a growing necessity for building an all-island dataset. This must be regarded as a critical infrastructure for future collaboration – with both ICRD and AIRO having the expertise to work with a sponsoring Department on this.

8.9. Climate change is a critical area on which we need to work better with our neighbours. Local government is leading the way on this; with Donegal County Council and Derry City and Strabane District Council leading by example in their collaborations on climate change

---

## **9. Climate Transition and Our Environment**

**Chapter:** 9. Climate Transition and Our Environment

9.1. This is a critical chapter, highlighting the importance of transitioning to a low carbon economy – with the associated implications this has for climate adaptation, growing the renewables sector, and green infrastructure. Environmental assets do not adhere to man-made boundaries and it is widely recognised that there are many challenges - and opportunities - in integrating environmental management and development strategies at national, regional and local-policy level. Protection and management of the environment lies at the heart of European thinking; with the need to protect and conserve the environment referenced in numerous Directives.

9.2. Ireland's distinctive landscape is a living environment – a mix of settlement, 9, and protected areas. How these spaces comfortably co-exist can be challenging - especially in the areas of tourism, renewable energies, strategic infrastructure provision, etc.

9.3. The physical and natural environments of Ireland are undoubtedly an asset that can provide scope for future potential growth and add to the quality of life of the region's inhabitants.

9.4. There is a growing understanding of the core role of nature-based solutions in protecting, managing and restoring natural and modified ecosystems under pressure from population growth. Their recognition within this framework is welcomed.

9.5. At regional and local government level, there is a growing emphasis being placed on the need to plan more strategically for blue/green infrastructure to not only create a climate resilient and adaptable society but also to support the transition to sustainable energies. The acknowledgement of the role of green/blue infrastructure in this framework is welcomed – part. in terms of blue infrastructure which was largely absent from the original framework.

9.6. The approaches of Ireland's regional cities to climate neutrality are varied, reflecting their regional and local priorities. Regional and local government are taking on the role of leaders and innovators in the design, roll-out and monitoring of initiatives aimed at achieving climate neutrality by 2050. They are also demonstrating a commitment to knowledge transfer and dissemination through engagement in EU networks.

9.7. There is no one-size fits all model of climate adaptation for Irelands' regions, cities and local communities – nor the role of BGI within that. Adopting a place-based approach to climate adaptation is important – albeit there are acknowledged challenges to this.

---

## **10. Implementing the National Planning Framework**

**Chapter:** 10. Implementing the National Planning Framework

10.1 There has been widespread agreement from the very outset that there needs to be clarity around how the NPF will be implemented, how it will be resourced and how its progress will be tracked.

10.2 It is increasingly recognised at all levels of government that how we live and work does not adhere to administrative boundaries but more so to functional boundaries. This needs to be reflected in the implementation of the NPF with key delivery agents being encouraged to cooperate across and outside of their administrative borders. This is especially true of initiatives that span the common goals of economic development, enhanced connectivity, environmental management and protection and improved health and well-being.

10.3. Potential barriers and risks to implementation are mainly lack of understanding of not only the core objectives of the NPF and their inter-relationship between spatial planning and other sectors such as economic growth, connectivity, environmental management and health and well-being. Indeed, there is a clear need for much more action research that is aimed at the general public and which details the inter-relationship and resulting good and bad practices under certain conditions - especially as it relates to health and well-being.

10.4. Lack of strong leadership is a further challenge to the implementation of the NPF; with again a clear need for investment in capacity building in this area. Such capacity building includes a focus on coordinated approaches to balanced regional development that is also sustainable, and which ensures that this type of coordination can happen alongside normal business.

10.5. Critical to implementation of the NPF is the establishment, at regional level, of delivery bodies – charged with delivery of the respective national policy objectives as they relate to respective regions. Such bodies should comprise a broad range of regional stakeholders, critical to the sustainable and balanced development of the region. This was a key deficit of the past six years in the implementation of the original framework. The recent

work of the OECD should aid the formation of these boards. Such an approach must be regarded as part of core business (rather than sidelining into specialist functions). Working arrangements cannot be rigid – they must be flexible to facilitate joint coordination and redress of issues as they arise.

---

**Documents Attached:** No  
**Boundaries Captured on** No  
**Map:**