



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

Paul Hogan
Assistant Secretary
Planning Division
Department of Housing,
Local Government and Heritage
Custom House Dublin 1

12th September 2024

Dear Paul

The Office of the Planning Regulator (OPR) welcomes the publication of the Draft Revision of the National Planning Framework (NPF). We also commend the extensive work undertaken by the Department's team at a time of many legislative, policy-making and operational demands.

The documentation provided was extensive, the tracked changes version of the draft being particularly helpful in following the changes between the current NPF and proposed revisions.

The review is timely, responding to both evolving Government policy in many areas such as climate action, infrastructural investment and the digital economy, but also more up-to-date information from Census 2022 and other sources in relation to demographic change, migration, housing delivery and regional economic performance.

We appreciate the opportunity afforded to us to input to the work of the expert group tasked to provide some initial scoping on the review, which the draft NPF document has broadly sought to address.

This submission is a high-level one. The functions of the Office requires regular interaction with the Department as regards many practical aspects of the current framework's meaning and practical effects. Our plans assessment team can provide more detailed technical feedback on specific aspects of the existing NPF and how the draft NPF review document addresses these, particularly in relation to the practical implementation of National Planning Objectives (NPO) 7 (compact growth targets), 10 (transit oriented development), and 16 (city population growth).

We also strongly support NPO 75/76 in relation to onshore renewable energy targets as were recommended in our recent research on climate action and the local authority development plan process.¹

¹ <https://www.publications.opr.ie>

Further engagement concerning the practical operation of NPO 85 (no net loss of biodiversity) would be helpful in the context of learning from the experiences of other administrations in this regard, which the OPR may be in a position to assist in researching.

We also strongly support NPO's concerning Transit-Oriented-Development and associated urban area plans, infrastructure delivery and monitoring (93-102) as implementation is critical in securing the aims and objectives in the NPF.

In a broad sense, a pivotal issue the original NPF and its update addresses, is the setting of a high-level national strategy for the long-term proper planning and sustainable development of Ireland.

A key requirement for the NPF to be relevant and effective is that it both takes account of all the relevant information and perspectives to hand but that at the same time addresses the key issues by making reasoned and informed choices, such as in relation to strategic patterns of development across the country.

Ireland is currently experiencing great economic opportunity and fiscal prosperity but faces key challenges ahead too in relation to where and how to sustainably accommodate a rapidly growing population in a manner that will be compatible with growing and profound climate challenges and our commitment to address these.

The period that the framework addresses will inevitably require it to be agile and responsive in adapting to potentially changing circumstances, which requires key choices being made in securing the National Strategic Outcomes.

Holding the NPF's original focus on a balanced distribution of growth across our country's regions, harnessing the attractiveness and assets of all regions and places remains valid and chimes with the concept of regional potential highlighted as far back in the European Spatial Development Perspective of 1999.

From our work, we concur that Census 2022 signals a growing population in every county across the country, albeit that a greater rate of natural population increase has materialised in Dublin and the Mid-East. It is acknowledged that moving towards a position where the growth of the East and Midlands and the rest of the country are more in step with each other will take time and it is a matter for Government to hold to that objective from a number of standpoints.

We note and support the retention of the commitment to the promotion of city-based population and employment growth with a target of 50% of future population and employment growth to be focused in the existing five cities and their suburbs including the various growth targets for the cities of Cork, Limerick, Galway and Waterford.

In our statutory roles, we will work to ensure that when the revised National Planning Framework is finalised, it is incorporated into the Regional Spatial and Economic Strategies and the City and County Development Plans, through updated Housing Supply Targets.

In this regard there is an important piece of information that the Department, local authorities and the Office could and should research quickly, and that onward implementation of the NPF, as finalised, would benefit greatly from.

This would be a high-level mapping database of key parcels of zoned land for residential development cross-referenced to the infrastructural status of the physical and social infrastructure that their activation is critically dependent on. The residential zoned land tax (RZLT) database is a good first step in this regard but would benefit from deeper analysis in the context of determining any additional strategic infrastructure requirements. Such a baseline would be an important reference point for the practical operation of many of the NPO's referenced earlier in this submission.

In conclusion, the Office supports the finalisation of the review and update of the NPF in ensuring Ireland benefits from an up-to-date planning strategy that is clear and practical in its interpretation for local authorities and the OPR in its statutory roles.

However, as we have highlighted in previous work such as the Learning and Development Strategy for the planning sector and other work on the funding of the planning process and plans for resourcing, enhancing the capacity and skills of the planning process remains vital in the context of it successfully addressing the scale of ambition set out for it in the revised NPF by Government. We remain committed to working with the Minister and Department in enabling such objectives and ultimately the successful implementation of the National Planning Framework as revised.



Niall Cussen
Planning Regulator