



**Chambers
Ireland**
Advancing business together



**Chambers Ireland's Submission to the
Department of Housing, Local
Government and Heritage's Consultation
on the First Revision to the National
Planning Framework (NPF)**

September 2024

About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

Our Network has pledged to advocate for and support the advancement of the United Nations Sustainable Development Goals (SDGs) and, in 2023, we were appointed to be an SDG Champion as part of the 2023-2024 SDG Champions Programme. Accordingly, we use the Goals as a framework to identify policy priorities and communicate our recommendations. We have a particular focus on five of the goals encompassing decent work and economic growth (SDG 8), sustainable cities and communities (SDG 11), gender equality (SDG 5), industry, innovation and infrastructure (SDG 9) and climate action (SDG 13).¹

In the context of the current consultation, each of these SDGs is of relevance, as the National Planning Framework is the overarching spatial planning and development strategy for Ireland that, together with the National Development Plan, will define the policy and planning framework for the social, economic and cultural development of Ireland. This encompasses decent work and economic growth; sustainable cities and communities; gender equality; industry, innovation and infrastructure; and climate action.

¹ The Chambers Ireland SDGs. Available at: <https://chambers.ie/sustainable-development-goals/>

1. Vision:

Chambers Ireland agrees with the commitment to balanced regional growth across the country and an overall 50:50 distribution of growth between the Eastern and Midland region, and the Southern and Northern and Western regions, with 75% of the growth to be outside of Dublin and its suburbs.

As an all-island business network representing 37 Chambers of Commerce from across the country that in turn represent over 8,500 businesses, it is important that every town, city and region across Ireland is subject to balanced regional development and investment.

The concerns of our network can vary in intensity but do not vary in theme, as many of the same issues and obstacles are problematic for smaller towns, as well as our largest cities.

The supply of housing has consistently been one of the primary issues reported by each Chamber and difficulties attracting and retaining suitably qualified employees has been the knock-on impact for many of the member businesses they represent across the country.

Development of and investment in essential infrastructure including transport, water, and energy is another key concern for Chambers. Certain areas of the country are calling out for investment as current systems hit capacity limits and without future investment and a long-term sustainable vision, these regions cannot realise their growth potential.

Issues of vacancy, dereliction, and anti-social behaviour have been impacting our towns and cities and our member Chambers report that this is harming the vibrancy of our urban centres and impairing the attractiveness of our regions as places to live, work and do business.

Climate action and sustainable development have been a core focus of our network for a number of years. We have consistently advocated for increased action in this space. Energy security and maximising our renewable energy potential have been key components in our advocacy, as we have sought to highlight that accelerated action could be a substantial driver of economic growth for the country.

In recent years, competitiveness has risen to the fore as the overarching concern for businesses and which encompasses many of the priority areas listed above. Our ability to compete on a global scale will require the next National Planning Framework to be ambitious in its reach and proactive in its policies.

Defining the high-level strategic planning and development priorities for the country out to the year 2040 has important implications for the direction of development in Ireland and how we can not only mitigate the issues above but foster vibrant, thriving communities.

The draft review predicts that the national population will increase by 1 million between 2022 and 2040. This expansion must be strategically distributed across the country and must result in growth that can be sustainably managed. It is welcome to see densification through targeted land activation and land management provisions being emphasised as a key priority of the NPF and the focus on recognising and supporting enterprise specialisations and clusters to drive economic activity is a positive inclusion in the review that will be welcomed by our Network. This should help ensure that future growth plans are strategically linked to the availability of jobs and that companies providing economic opportunities within a region can help propel their local area to further growth.

The 2023 Expert Group Review of the 2018 NPF Strategy and Implementation made three excellent recommendations that should be the foundation of the latest review. Setting ambitious compact growth targets, the need to clarify and strengthen the roles of the implementing bodies of the NPF, and the need for greater coordination at whole of government level across all infrastructure projects. In some areas of the review, the integration of these recommendations has not been strong enough in order to realise their potential. These principles should be carried out across each Chapter to ensure better coordination and increased transparency over the coming years.

2. A New Way Forward

We support the ambition for Ireland's four cities outside of Dublin - Cork, Limerick, Galway and Waterford - to become cities of scale and drivers for regional economic growth. It is important that there is a balance across the country, however, our concern is that this regional spread neglects certain pockets of the country, particularly the North-West and Midlands regions. While this is considered in the Review, it does not adequately address these concerns.

Recognising the impact that digitalization has had on city vibrancy, as a result of changed shopping and working patterns, is a positive reflection in this Review and will require an agile planning and policy response over the coming years. A potential consequence of this is that we are increasingly hearing from our network of Chambers that the prevalence of anti-social behaviour, crime, vacancy and dereliction has increased and safety is an ongoing concern in many urban centres across the country. This is having an effect on foot traffic and the perception of towns and city centres as places to live, work, shop and visit.

Densification and compact growth is posited as a potential solution, which includes making better use of under-utilised land and buildings including infill, brownfield and publicly owned sites, and vacant and under-occupied buildings. It is very welcome that there will be a key focus on development where there is greater job density, existing public services and facilities, and connected transport networks. However, if this is to be the case, the systemic issues above of anti-social behaviour, crime and levels of safety in urban centres will need a holistic approach that extends beyond the remit of the National Planning Framework and requires multi-agency collaboration. Additionally, a cultural shift will be needed to improve the public perception and attractiveness of urban areas as places in which to settle. This is in part compounded by our history of expanding development of greenfield sites that results in urban sprawl and the focus on developing larger houses, as opposed to more compact units and apartments.

One concern with the emphasis on densification and compact growth is whether it fails to adequately account for housing demands in more rural areas. Our network of Chambers across the country have all reported shortcomings in the supply of housing and, where businesses may

be established in more rural areas, the NPF review does not go far enough in addressing the needs of these businesses and their employees.

While it is positive to see clear targets attributed to each of the regions and the projected level of population and employment growth in the Eastern and Midland Regional Assembly area to be at least matched by that of the Northern and Western and Southern Regional Assembly areas combined, the projected growth for the Northern and Western Region is significantly smaller than the other regions. This region has enormous potential in terms of renewable energy over the coming years, as we scale up our ambition in this space and accelerate our transition to green energy and greater energy security. However, realizing this potential will only be possible where there is housing and services to attract the skilled workers that will be needed to manufacture and maintain such large-scale energy infrastructure.

Lastly, the commitment to developing a new approach to monitoring urban growth and the delivery of an updated 'Implementation Roadmap' are welcome measures that will enhance transparency and ensure that all stakeholders are more accountable for their actions in progressing each of the Policy Objectives.

3. Effective Regional Development

As Chambers Ireland is an all-Island network, we believe in the importance of balanced regional development. Over the past couple of years where population growth exceeded forecasts, we have seen uneven rates of development across the regions with some areas experiencing unprecedented growth and others experiencing limited growth and even decline. It is important that the National Planning Framework seeks to redress this imbalance as a key priority.

Our Chambers across the country will offer their own expertise and locally-specific feedback on the specific details of the proposals for each region and city.

4. Making Stronger Urban Places

This chapter highlights the levels of growth we have experienced within a short period of time, with an 8% increase in the number of urban settlements between the 2016 and 2022 Census' and a total of 63% of the total population living within the boundaries of an urban settlement. This is positive when we consider the fact that such settlements are better equipped to provide essential infrastructure in areas such as transport, water, education, health and community services.

However, more than half of Ireland's largest towns measured in terms of population, are located within the Dublin or Cork city regions and it is recognised in the draft Review that the overall urban structure remains relatively weak as a result. This means that the ratio of jobs to residential workforce is largely skewed by commuters that leave their local area and travel to the cities for work. This has enormous implications for the economy, urban planning, the environment, public services and overall quality of life. We need to see a greater balance in commuter towns of local employment opportunities for local residents, and in cities we need greater investment in developing underutilised land and vacant properties to create housing for more people that wish to live and work in the city.

In section 4.4, which relates to jobs and enterprise development, it is recognised that at an urban scale "it is important to identify locations where enterprises can access competitively priced development lands, utilities and commercial properties to the highest standards available internationally." Some of our members have reported that the drive for housing and initiatives that are aimed at stimulating housing development and the utilisation of vacant or derelict properties, as well as planning difficulties associated with mixed-used units or above-the-shop conversions, have detracted from the availability of commercial spaces. This means that developers are converting units into housing-only units. In smaller towns in particular, it will be important to ensure that there is a sustainable supply of office spaces, retail units and other commercial blocks if we want to ensure that businesses continue to choose urban-centre locations for their enterprise.

The addition of 'smart specialisation' and 'clustering' policy in the new Review is a very positive new concept that Chambers Ireland would be supportive of, however, achieving and implementing this in reality may prove difficult. Our network would be happy to support with the development of such plans as they evolve.

5. Planning for Diverse Rural Places

In terms of protecting and promoting our rural communities, a lot of positive progress and action has taken place since the 2018 NPF with the Government's rural development policy 'Our Rural Future 2021-2025' and islands policy 'Our Living Islands: the National Islands Policy 2023-2033'. Ensuring continued momentum and monitoring will be crucial in creating diverse, dynamic and connected rural communities across the country.

The commitment to reliable and realistic sustainable mobility options and public transport is very important in ensuring that no area or region becomes cut off or isolated. Many of these regions also rely on tourism as important drivers for local economic growth, therefore, maintaining easy connections with larger nearby towns is important for sustaining these industries.

While RRDF funding has been an important mechanism in progressing essential infrastructure and developing public facilities for rural communities, our network have reported some issues in funding allocations that are no longer adequate for certain projects due to issues of inflation, the increased cost of raw materials and skills shortages in the construction sector. Such constraints have resulted in delayed development and delivery of capital projects. Indexing RRDF and URDF funding should assist in relieving some of these constraints in future.

The Town Centre First policy initiative, which was launched in 2022 has offered the 26 pathfinder towns across the country a significant boost with clear funding streams to regenerate and revitalise their town centres. We would like to see Town Centre First rolled out to more towns across the country and greater supports offered to the established Town Teams to learn from one another and implement best practice solutions for common issues. The

package of supports that has been promised for 2024 to expand on the delivery of the objectives of Town Centre First will be welcomed in this respect.

One issue that has not been addressed in relation to both rural and urban places is the increasing impact that crime and anti-social behaviour is having on communities across the country. Where crime and anti-social behaviour have risen in prominence, there is a proportionate impact on footfall that can negatively harm local businesses, tourism and the public perception of potential new residents. The safety and attractiveness of our towns and city centres is affected by the levels of vacancy and dereliction, the investment in appealing public-realm projects, and the development of community infrastructure. It is important to see this reflected in the review as a key consideration of our planning framework that will define the direction of development for the coming years.

6. People, Homes and Communities

We are supportive of the policy objectives within this chapter relating to quality of life, health and wellbeing, diversity and inclusion, and age friendly communities. Fostering vibrant and thriving local communities means ensuring that all members of society are treated fairly and are given equitable access to essential services and can contribute to the social and economic fabric of their local area.

The availability and affordability of childcare facilities across the country has been a growing concern for our membership. The ability to access appropriate childcare has a fundamental impact on the participation rate of parents in the Irish labour force. Some of our membership have reported issues with childcare facilities being forced to close or scaling back their operations due to issues within the system relating to operational costs and staff shortages. Encouraging and supporting this sector to thrive is important as Ireland is currently at full employment.

The new addition recognising the importance of schools and school places for children is positive. There is important recognition that while underlying enrolments at primary level have

been falling nationally, this trend has not been experienced in areas where there have been high levels of residential construction activity in recent years and this has been the experience of some of our network in high growth areas. Of particular note, is the provision of appropriate school places for children with special educational needs, which has been insufficient in meeting demand from across the country. Ensuring all children have access to educational opportunities should be a critical focus.

Increasing the availability and affordability of housing in Ireland has been the primary concern of our membership for the past number of years. While much has been achieved since the first iteration of the NPF was published, there are considerable impacts on business growth and competitiveness nationally where employees cannot find or access appropriate accommodation.

In the 2018 NPF, housing needs were determined to be 'at least 25,000 new homes' annually between 2018 and 2040. The latest Review determines that 'approximately 50,000 new homes' are needed per year. While this revision has been essential and demonstrates the increased demand that we have experienced over the last number of years, we have concerns that the new target may not be ambitious enough to realise real step-change in Ireland's housing market. With the publication of Housing for All, Chambers Ireland have sought to advocate for housing targets to be viewed as minimum targets, as opposed to optimum thresholds. Our ambition in this space could be greatly increased, particularly in the short to medium term in order to meet existing unmet demand.

Looking to the future and our growth ambitions for the country, we must scale up housing delivery as the population continues to grow and companies seek to attract global talent to meet workforce demands.

Lastly, adaptive reuse of existing building stock is positioned as a means of building resilience in housing. However, if this is to be effective, we need to see planning rules and fire regulations reviewed to encourage an uptake in such development.

7. Realising our Island and Marine Potential

The marine environment represents one of the most important elements in our renewable energy policy. The careful management of which has the potential to accelerate our green transition. We need to be ambitious, while balancing the protection and promotion of marine biodiversity with the need to extend our renewable energy production potential.

Realising this potential is a key priority for our network of Chambers across the country. Energy security has come to the fore as a key consideration for Chambers as we witnessed energy prices soaring and geopolitical instability in the wake of the Russian invasion of Ukraine. The result has been that many businesses have experienced significant increases in the costs of their energy output that has squeezed margins and made it difficult for many to survive and thrive. We've also consistently advocated for the economic potential of harnessing our renewable energy resources, in particular offshore wind. The planning system is a fundamental arbiter and enabler of such infrastructure.

If we are to meet our revised 2030 emission targets, we will have to reduce our total emissions by more than 20 million tons of CO₂. The Climate Action Plan aims to see half of that reduction arise through the migration of our electricity supply generation system to renewables. To increase the generation capacity of the onshore wind sector we will need to double the scale of our onshore wind turbine fleet. Simultaneously we will need to create an offshore fleet which has a greater capacity than the entirety of our current onshore wind generated electricity supply.

The Irish fleet of onshore wind turbines will have to more than double in capacity from just over 4GW up to 9GW in the coming years. However, many of the projects which are in development may be unable to progress due to regulatory impediments in the planning process. The ambition for wind in Ireland over the coming decade is enormous as it requires us to more than treble the size of our wind energy production industry, adopt new technologies to the Irish electricity grid, and upgrade, reinforce, and build huge amounts of transmission equipment to bring renewable energy from where it is generated to where it is needed. This effort requires a regulatory regime that fully supports that ambition. One of the primary obstacles to meeting

our climate goals is the failure of the planning system to adequately facilitate offshore wind farm development at the pace that is needed.

In addition to this, the capacity of Irish ports to support the delivery of our offshore wind targets is insufficient and there needs to be a clear development roadmap and significant investment allocated. By developing suitable ports, we can support the growth of the offshore wind sector and strengthen Ireland's position as a leader in renewable energy. It is therefore welcome to see the National Policy Objectives 51 and 52 being clear on this ambition.

While much has been achieved in our renewable energy output over the last number of years and it is positive to see the level of change demonstrated in this Review of the National Planning Framework when compared to the 2018 edition, there is still a lot more that will need to be achieved and unlocking the planning system will be fundamental to this.

8. Working with Our Neighbours

Developing and maintaining strong collaborative relationships with our neighbours in the EU and the UK is very important to our members.

We represent a number of Chambers in border locations that have been strong partners with stakeholders on both sides of the border and have helped to address common strategic concerns. The Shared Island Fund, Project Ireland 2040 funds, the Government's annual funding for North/South cooperation and the PEACEPLUS programme have all contributed to greater cross-border cooperation, particularly in light of Brexit and the impact this has had and continues to have on border regions.

The new addition of section 8.3, which relates to collaborative investment and development of research and innovation streams, education and trade across the island of Ireland and between Ireland and the United Kingdom, demonstrates the potential opportunities to create more jobs and generate additional enterprise and tax revenues that in turn contribute to prosperity and better services for the entire population.

Transport connectivity between the regions has been a key priority for our border chambers and beyond, as all have advocated for the benefits that would be derived from regular and reliable transport links to the North. Businesses and tourism on both sides of the border depend on such connections.

9. Climate Transition and Our Environment

The updates to this chapter succinctly define the level of ambition that has been accelerated in relation to climate action and environmental sustainability since the 2018 iteration of the National Planning Framework was created and published. The full suite of in progress and emerging EU Directives, national legislation and policy approaches demonstrates the seriousness of the issue and the commitment of Government at all levels to tackling it.

The National Planning Framework is an important mechanism for reinforcing the priority of sustainable development and environmental protection across the whole of the planning system. The commitments to compact growth, transport-oriented development principles, re-use and repurposing of existing building stock, and the incorporation of climate-conscious planning at all levels across the State will help support the decarbonisation of the system. However, it is worth noting that in spite of intensive national efforts, Ireland is still only on course to achieve a reduction of 29% in greenhouse gas emissions by 2030, compared with the target of 51%. This is not good enough and highlights a need to rapidly accelerate our climate ambitions with real, tangible, measurable and sustainable action..

The new inclusion of biomethane in this section is a positive addition from the 2018 version. With a National Biomethane Strategy published earlier this year, it is important to recognise the potential opportunities of utilising farm and food waste to produce carbon-neutral biomethane gas and, with a national target of 5.7TWh by 2030, the planning system will need to support the delivery of anaerobic digestion facilities to meet this demand.

The section on renewable electricity maps out the ambitious targets that have been set for 2030 and the levels of growth that will be required to realise these targets. We have outlined

our concerns in the chapter on ‘Realising our Island and Marine Potential’. One crucial aspect to accelerating our delivery of a renewable electricity market for Ireland is the need to radically reinforce and upgrade our grid infrastructure that can connect all of the new renewable generating stations, including wind, solar and hydropower, to the electricity grid and enable the movement of electricity from where it is generated to where it is needed. If the planning system does not facilitate such development, then our ambitions to decarbonise the electricity system will fail. Front-loading investment and development now will mean that grid reinforcements and upgrades can scale to meet anticipated demand in future years based on expected population growth and increasing demands from industry. So much of our necessary infrastructure development over the next 15 years is dependent on our continued strong investment in grid infrastructure. We should also utilise the REPowerEU guidance on ‘overriding public interest’ in order to deliver the grid upgrades and reinforcements needed to support high capacity onshore and offshore energy networks.

The creation of new regional renewable electricity capacity allocations will introduce proposed targets for each Regional Assembly in relation to renewable energy generation. Imposing clear, measurable and transparent targets should mean better public accountability and encourage all regions to proportionally do their fair share in meeting the energy needs of the country. However, we would not want to view these targets as limits and stifle development.

Water quality and the availability of adequate supplies of clean drinking water and waste-water treatment facilities has been a growing concern for our network, given the strain on the current system and the need for a rich supply of water into the future to service the growing demands from our increasing population and to meet our national infrastructure targets. The focus on increasing housing development demands that more action should be taken to ensure that there will be sustainable supplies of water to service our growing needs. Supporting the delivery of the Eastern and Midland Regional Water Supply Project and the Greater Dublin Drainage Schemes are two projects that need to be accelerated as a priority in order to bolster the resilience of our water infrastructure for future growth and development. The planning

system can be a key enabler of such works and the National Planning Framework Review should emphasise these concerns.

10. Implementing the National Planning Framework

The proposal to advance reforms and actions that are aimed at enhancing capacity and addressing constraints in the delivery of National Development Plan projects is necessary. Key deliverables in housing, energy, climate, transport, healthcare and education have been beset with delays and cost overruns that threaten their viability, create unnecessary disruption, exacerbate issues with the capacity of current systems and impact individuals, families, businesses and the economy more broadly.