



Review of Monitoring Reports on Regional and Economic Strategies by Regional Assemblies

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Foreword

The National Oversight and Audit Commission (NOAC) was established under the Local Government Reform Act 2014 to provide independent oversight of the local government sector in Ireland.

One of NOAC's statutory functions under the Act includes monitoring the implementation of the Regional Spatial and Economic Strategies. This review is based on the monitoring reports prepared by the Regional Assemblies.

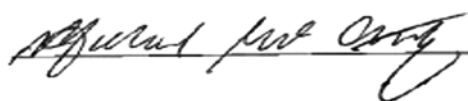
NOAC requested the assistance of the Office of the Planning Regulator (OPR), which has specific expertise in this area, in undertaking a review of the two-year monitoring reports of the Regional Spatial and Economic Strategy (RSES) prepared by the Eastern and Midland Regional Assembly, the Northern and Western Regional Assembly and the Southern Regional Assembly.

The research summarised in this report sets out key findings and recommendations, which we hope, can help further support the monitoring and implementation of the RSES.

I wish to extend my gratitude to the OPR for their continued collaboration with NOAC and for their assistance in the delivery of this report.

I would also like to thank the members of NOAC's Working Group on Local Government Governance and Reform and the NOAC Secretariat who have dedicated their time and expertise to this project.

Therefore, it is with great satisfaction that I introduce the NOAC commissioned report "Review of Monitoring Reports on Regional and Economic Strategies by Regional Assemblies".



Michael McCarthy
NOAC Chair

13th March 2024

Key Findings report

1. Introduction

Further to the request and terms of reference issued by the National Oversight and Audit Commission (NOAC) to the Office of the Planning Regulator (OPR), the OPR has undertaken a review of the two-year monitoring reports prepared by the Eastern and Midland Regional Assembly, the Northern and Western Regional Assembly and the Southern Regional Assembly for their respective Regional Spatial and Economic Strategies.

This report sets out the key findings of the OPRs review, focussing on:

- (i) the issues of strategic importance to the implementation of the RSES, including identifying any major obstacles to implementation;
- (ii) recommendations in the monitoring reports that, if implemented, could be deemed to make a significant contribution to the further implementation of the RSES;
- (iii) implementation of the RSES by local authorities; and
- (iv) the process undertaken by the regional assemblies to complete their monitoring reports, including any suggestions on how this could be improved in later iterations.

The report details ten key findings in relation to the following:

- (i) mechanisms needed to support the effective implementation of the Regional Spatial and Economic Strategies;
- (ii) significant governance structures needed for the implementation of the Metropolitan Area Spatial Plans (MASP) for the five regional cities;
- (iii) greater alignment between funding decisions to support the spatial strategies of the RSES, particularly in relation to focussing investment in the cities, regional growth centres and key towns;

- (iv) strengthening of the structural alignment between the regional assemblies and government departments;
- (v) prioritisation of additional resources to support local authorities in the preparation of statutory plans for key settlements;
- (vi) consideration of a more active role for the regional assemblies where there are obstacles to co-operation or where local authorities act in a manner that would significantly hinder the implementation of the RSES;
- (vii) amendments to the statutory functions of regional assemblies to remedy existing gaps regarding certain stages/types of statutory plans;
- (viii) suggestions on how monitoring could be improved in later iterations, including greater use of digital data, such as the Regional Development Monitor to track and compare progress on key indicators across the three regions and to improve engagement with public bodies.

The monitoring reports outline a wide range of positive initiatives undertaken by the regional assemblies, often in collaboration with other public bodies, local authorities and European partners, to support the implementation of the strategic objectives of the RSESs. For example,

- the Regional Development Monitor, developed jointly by the regions but led by the EMRA, which provides a digital hub for spatial data related to the implementation of the RSES;
- the establishment by the EMRA of a specific implementation group for the Dublin MASP with political oversight from the existing Strategic Policy Area Committees and a new MASP Strategic Policy Area Committee;

- research undertaken by the regional assemblies to enable implementation of the RSESs, for example:
 - COVID-19 Regional Economic Analysis – published in May 2020;
 - A Region in Transition: The Way Forward – published by NWRA in January 2020;
 - Regional Approach for development of a Smart Specialisation Strategy in the Southern Region;
- the Development of a framework/toolkit to support a regional approach for Smart Specialisation Strategy by SRA;
- the development of a Regional Freight Strategy, Ports and Harbour Strategy, and Airport Strategy for the southern region (in consultation with the Department of Transport);
- the role of the regional assemblies in developing a series of pathfinder projects to be delivered within three years to accelerate modal change to sustainable transport, achieve lower carbon emissions from transport and optimise Active Travel funding;
- the role of the regional assemblies in supporting the Just Transition Process at a national and EU level;
- the completion of the first phase of the QGasSP project aimed to develop a simple and proportionate method for quantifying and forecasting the relative GHG impacts of alternative spatial planning policies, with pan-European applicability; and
- collaboration and engagement on strategic issues relating to policy alignment between city/county development plans and the RSESs, which takes place during periodic meetings of the Plans Evaluation Forum attended by officials from the OPR, regional assemblies and the prescribed bodies¹.

The Regional Assemblies each clearly demonstrate their commitment to the successful implementation of the RSES and to supporting the vision for a new region-focused strategy for growth, in accordance with the National Planning Framework and Project Ireland 2040.

The significant investment by public bodies in a range of initiatives which support the implementation of the NPF and RSES and address many of the key enablers in the RSES should also be recognised. Of particular note, is the preparatory investment in the Cork Docklands and Waterford North Quays to support regeneration; new and upgraded road infrastructure to unlock strategic sites in Sligo Town; major investment in water and wastewater infrastructure to support housing delivery in the Dublin MASP; and more generally URDF/ RRDF funding.

Notwithstanding the initial progress over the two year monitoring period, it is clear that there are a number of challenges and obstacles, such as a lack of resources within some local authorities to enable funding bids which, if not addressed, could undermine implementation of the RSES.

2. Regional spatial strategies

The RSES provides a spatial dimension to the implementation of public policy at regional and county levels, and, in particular, the strategy for more balanced regional growth in the National Planning Framework (NPF). A key aspect of this strategy is the concentration of growth in our main urban settlements to create centres of scale, comprising the five cities and five regional growth centres designated in the NPF, and the Key Towns designated in each of the RSES.

The EMRA report refers to development trends that demonstrate a slower pace of housing delivery within the Dublin City and suburbs area and, in particular, on large regeneration sites, with growth instead occurring in the commuter settlements that are not designated for growth in the RSES. Examples of strategically important development areas in the Dublin MASP include the Naas Road (City-Edge) and North Fringe (Clongriffin and Baldoyle).

1 Bodies prescribed under the Planning and Development Regulations 2001 for the purposes of Development Plans.

The EMRA recommends that further measures may be required to bolster convergence towards the NPF and RSES settlement strategy.

The SRA report similarly raises concerns regarding growth targets for the Waterford, Limerick-Shannon and Cork MASPs and delivery at the scale needed particularly given the trajectory of growth to the Dublin Region, which they consider will significantly undermine the NPF & RSES policy.

The NWRA's figures for the key urban centres show the delivery ambitions for the RSES running at only 20-30% of the necessary number of housing units required to deliver on the population targets set out for the Galway MASP, Sligo and Letterkenny Regional Growth Centres and Key Towns.

The current trend is, therefore, that the majority of cities and large settlements are not meeting their development housing targets, which could undermine a number of key National Policy Objectives of the NPF related to balanced regional development, compact growth and developing centres of scale.

The EMRA and NWRA argue for a greater recognition of the difficulty of delivering urban sites and the need for more targeted funding, for example through the URDF.

Key Finding: Regional Spatial Strategies

A major focus is required in terms of measures to support the RSES spatial strategies which direct significant growth to MASPs, regional growth centres and key towns and to assist with developing centres of scale, regeneration and compact growth. This should take account of the longer lead-in times for housing delivery on large and complex brownfield regeneration projects, while putting in place safeguards to direct any short to medium term under-provision within metropolitan areas to the locations with the best mix of opportunities for public transit oriented development and energy efficient development consistent with the strategic objectives of the RSES.

3. MASP Implementation

The RSES includes a Metropolitan Area Spatial Plan for Dublin (EMRA), Galway (NWRA), Cork, Limerick-Shannon, and Waterford (SRA), which are crucial to building stronger regions in a manner that protects the environment and addresses climate action. Each of the regional metropolitan areas include areas within two local authorities, with the Dublin MASP including parts of seven local authority areas.

Significant co-operation between the neighbouring authorities will, therefore, be required to provide a unified voice for the city metropolitan areas and to effectively implement the strategic objectives of the RSES.

Albeit that they represent an early stage in the process, the monitoring reports present an uneven picture in terms of MASP implementation.

The EMRA report details a clear governance structure, including a specific implementation group with political oversight from the existing Strategic Policy Area Committees and a new MASP Strategic Policy Area Committee. The MASP Implementation Group includes key stakeholders from the infrastructure and enterprise agencies, local authorities and the Department of Housing, Local Government and Heritage (DHLGH), and the MASP Committee comprises of elected members representing the seven local authorities. The report lists a number of key decisions made through these structures, including prioritisation of investment.

In relation to Galway, the NWRA identifies the need to establish similar governance structures. While existing areas for cooperation across both authorities are noted, no specific MASP implementation structures have been put in place.

In relation to the Cork, Limerick-Shannon and Waterford MASPs, the SRA states that the establishment of effective delivery mechanisms for the MASPs is a significant issue for the Assembly, and there are concerns regarding the lack of progress in establishment of such mechanisms. A clear need is identified to implement a mechanism to ensure the delivery of targets in the three regional cities in line, with NPF/RSES objectives.

It is clear that, with the exception of the Dublin MASP, there are significant governance and implementation gaps within the regions and cities that are holding back the delivery of regional and city growth targets and the implementation of the RSES.

Key Finding: MASP Implementation

The possibility of focused, highly empowered and accountable implementation structures to better develop and implement the Metropolitan Area Strategic Plans should be explored with stakeholders, including the local authorities, regional assemblies, relevant government departments and public bodies and wider civil society interests. This may require legislative, budgetary and policy supports. A particular area to explore would be delegating new MASP implementation structures with both budgets and powers to transform city regions in a strategic and co-ordinated fashion.

4. Funding alignment

Specifically, in respect of funding to assist the implementation of the RSES spatial strategies, the monitoring reports indicate that interaction with funding sources has been variable and that there is a need for ring-fenced funding and greater resources to tap in to funding sources available.

The EMRA and NWRA reports comment that the regional growth centres (including Galway city) are areas that have not benefited as much from URDF and RRDF funds, and also recommend that the bidding process for URDF is revised to secure enhanced and ring-fenced funding for complex and large scale regeneration projects to support compact growth and the spatial strategy in the RSES, including funding and better resources to support bids.

The NWRA also states that the Croí Cónaithe funds should form part of a dedicated fund to enable schemes build on place-making credentials and support compact growth across the region's key settlements.

The report also argues for 'positive discrimination' in favour of improving the region's infrastructure and states that consideration should be given to reducing the proportion of matching funding required by planning authorities in the region reflecting the approach by the EU.

While recognising the strong preparatory work and investment to date in relation to investment in public services and infrastructure to support growth, the SRA expresses significant concerns regarding delivery at the scale needed.

The report makes a number of recommendations to support and accelerate investment to achieve RSES implementation, including:

- review of funding mechanisms to achieve NPF and RSES objectives;
- requirement for an effective delivery mechanism to progress the development of the MASPs; and
- the establishment of a dedicated long-term budgeting mechanism to drive the achievement of the accelerated growth of the three MASPs.

The EMRA also raise the example of the need for greater integration of the regional assemblies into research, investment and development decisions at a sectoral/departmental level, for example regarding research on skills and innovation and investment infrastructure/facilities to support the education sector.

Key Finding: Funding Alignment

Consideration should be given to mechanisms to ensure greater alignment between funding decisions to support the spatial strategies of the RSES, particularly in relation to focussing investment in the cities, regional growth centres and key towns. This includes structures to enable budgetary dialogue and co-ordination with relevant departments and agencies; criteria for funding appraisals to prioritise investment critical to enabling regional ambition; and specific funding streams for making and progressing complex funding applications.

5. Structural Alignment

Allied to the funding alignment above, implementation of the RSES is also dependant on the actions of government departments, public bodies and their agencies. Recognition of this relationship is reflected in Section 25A (1) of the Act which requires specified public bodies to submit a report to the assembly as part of the 2-year monitoring process setting out progress made in supporting objectives, relevant to that body, of the strategy.

The SRA considers that the effective implementation of many RSES and MASP objectives rely on a strong working relationship between the regional assembly and government departments, and identifies the need to strengthen the structural relationship between the regional assemblies, DHLGH, government departments and the Project Ireland 2040 Board.

The EMRA recommends that the regional assemblies have a greater role in informing national policy and in the development of strategies or action plans related to the implementation of national and regional policy. The involvement of the EMRA on several implementation groups such as the Town Centre First Initiative and the Local Economic and Community Plan review group is seen as enabling the prioritisation of the policy context and spatial strategy of the RSES and Project Ireland 2040.

A strong and clear relationship between the regional assemblies and departmental and similar agents is, in fact, beneficial to both. The ability of the regional assemblies to oversee implementation of the RSES is dependant not only on local authorities working at a local level, but also on the alignment of policy and actions being taken at a national level. Similarly, the regional assemblies provide a mechanism for considering the spatial aspects of national policy at a more local level, and coordinating its implementation.

The monitoring reports refer to a number of instances where the assemblies have coordinated efforts with government departments in terms of implementing both the RSES and departmental projects.

Examples of this include, the development of pathfinder projects to accelerate modal change to sustainable transport and achieve lower carbon emissions, work to advance Regional Renewable Electricity Strategies and the publication of research confirming the major contribution that a new Atlantic Technological University would make to Ireland's economy.

There is, however, an absence of clear and robust governance structures to give wider and more consistent effect to the necessary structural alignment needed to maximise the benefits that are evident from these burgeoning relationships and ensure that RSES implementation is fully considered at a departmental level.

Key Finding: Structural Alignment

Consideration should be given to strengthening the structural relationship between the Regional Assemblies, DHLGH, Government Departments and the Project Ireland 2040 Board. This includes clear and robust governance structures to ensure effective policy alignment and implementation of RSES and MASP objectives.

6. Local Planning Authorities

The vast majority of local authorities in the three regions provided a response to their respective regional assembly to meet their reporting requirement, the exception being Galway County Council.

In respect of planning policy alignment with the RSES, all but one of the 31 planning authorities commenced either a review or variation of the city/county development plan to align with the RSES as required under the Planning and Development Act 2000. The exception was Donegal County Council².

² The review of the Donegal County Development Plan commenced in August 2023 and is due to come into effect in September 2024.

The reports highlight a number of areas of good practice in terms of implementation of the RSES including:

- the Cork City Capacity Study to assess capacity for future development within existing underutilised zoned lands, including greenfield, brownfield and infill sites within the built-up footprint;
- the 'Urban Greening' approach which supports compact growth and quality placemaking in the Tipperary County Council Development Plan;
- the translation of the agreed transitional population figures for the Dublin MASP into the core strategies of the relevant development plans; and
- Regional Vacancy and Dereliction Analysis identifying over 44,000 sites across the NWRA region.

However, progress with preparing urban area plans or local area plans for the regional growth centres and key towns is less advanced with some notable delays. Since the publication of the monitoring reports, with the exception of a new LAP for Letterkenny, limited or no progress has been made in respect of a UAP/LAP for the other regional growth centres including Dundalk (Issues Paper stage), Drogheda (not commenced), Athlone (not commenced) and Sligo Town (not commenced).

In addition to limited progress regarding the preparation of a UAP/LAP for the three regional growth centres in the EMRA, the Assembly also highlights lack of progress in relation to some of the larger key towns such as for Bray and Swords.

The NWRA states that there is significant risk that Athlone will fall behind other growth centres and the creation of a legally backed governance structure to promote a joint plan is imperative.

This is of concern since the regional growth centres have an important role in '*Strengthening Ireland's overall urban structure*' (NPO 7 of the NPF) and have significant population targets to create centres of scale in each of the RSES.

In respect of progress with new LAPs for the 33 key towns, only eight have new LAPs, with 16 commenced and 9 not commenced. This is also of concern since the key towns have an important role in the county settlement hierarchies and are targeted for significant population growth in the core strategies of development plans consistent with the implementation of the RSES.

In this regard, the OPR agrees with the Assemblies' recommendations regarding a need for greater resources to advance plan making for key settlements.

Active land management measures by the local authorities to drive housing development in the cities, regional growth centres, and key towns will also be critical, as will monitoring of housing delivery to provide a clear picture of development patterns and progress in terms of implementation of the regional spatial strategies.

Each of the regional assemblies also refer to forthcoming policy in relation to the development of a regional approach to renewable energy/ electricity. The SRA is developing this action in conjunction with the DECC, SEAI and the other Assemblies.

This is likely to involve a greater role for the regional assemblies in terms of determining renewable targets at a county level and will be critical to ensuring the implementation of national policy in relation to renewable energy consistent with obligations under the *Climate Action and Low Carbon Development (Amendment) Act 2021*. It also represents a more active role for the assemblies in the implementation of the RSES objectives relating to delivery of renewable energy capacity and climate action.

The recommendations from the local authorities set out in the the EMRA report refers to the need for coordinated spatial planning across county boundaries in areas such as renewable energy supported by leadership and direction from national and regional authorities; and the establishment of a steering group with relevant local authority representatives to progress regional projects.

It is evident from the monitoring reports that the assemblies work closely with the local authorities to implement the various regional projects and this level of cooperation will be key to any successful regional strategy, particularly in relation to potentially contentious projects such as a spatial strategy for renewable electricity and implementation of its recommendations into development plans.

Consideration should, however, also be given to provisions available to the assemblies where there are obstacles to such cooperation or where local authorities act in a manner that would significantly hinder the implementation of the RSES.

Key Finding: Resourcing of Local Authorities

Additional resources should be prioritised to support local authorities in the preparation of statutory plans for key settlements, specifically regional growth centres and key towns.

Key Finding: Implementation by Local Authorities

Consideration should be given to mandating a more active role for the Regional Assemblies where there are obstacles to cooperation or where local authorities act in a manner that would significantly hinder the implementation of the RSES.

7. Recommendations of the Regional Assemblies

In relation to recommendations contained in the monitoring reports not included above, the OPR considers that the following, if implemented, could make a significant contribution to the further implementation of the RSES:

Key Finding: Functions of regional assemblies in the statutory plan making process

That the regional authorities should have a statutory function regarding material alterations to a draft development plan, and local area plans prepared for settlements designated as regional growth centres and key towns in the RSESs. This may be remedied in the forthcoming Planning and Development Bill but would otherwise require legislative supports.

Key Finding: Local Authority Climate Action Plans

Given the emerging need for development plans to integrate measures relating to climate action and emissions reductions, the regional assemblies should be established as a prescribed body for submissions on local authority climate action plans to ensure cohesiveness with spatial planning. This may require legislative supports.

8. Monitoring reports

Section 25A (3) of the Act outlines what the two-year monitoring reports are required to address:

progress made in securing the overall objectives of the regional spatial and economic strategy, including any specific actions and outcomes, including actions specific to the public bodies.

While each of the monitoring reports have a different structure and approach to documenting progress made and recommendations for consideration by NOAC, the OPR is satisfied that the three reports submitted to NOAC satisfy the requirements of section 25A (3) of the Act.

The monitoring reports could, however, be presented in a concise logical format with information on progress clearly set out under specific regional strategic outcomes/overarching objectives and key regional policy objectives from the RSESs.

While the NWRA monitoring report provides a good example of logical format, there is scope for it to provide some additional information. Background information such as on the function of government departments/agencies and their key programmes and funding initiatives could be included as an appendix with appropriate cross referencing to the main report, where necessary. The SRA monitoring report provides a good example of this approach.

The development of the joint Regional Development Monitor provides a digital hub for spatial data, and the ability to monitor the performance of the RSES in a timely manner. Further, this information is shared with stakeholders and the public through the web based platform and support policy decisions by multiple stakeholders.

For example, the delivery of housing in settlements designated for significant growth under the RSES such as cities, metropolitan areas/towns and regional growth centres will be a critical issue for the regional assemblies to monitor and report on in subsequent monitoring reports. Future monitoring reports, in conjunction with the RDM, could usefully provide a clearer picture in terms of the spatial distribution of growth and the implementation of the RSES spatial strategies. The availability of 2022 census data and emerging data sources would make this more feasible for future reports.

Key Finding: Greater use of digital data

The Regional Development Monitor (RDM) is an effective way of gathering and sharing spatial data relevant to the implementation of the RSES. The monitor could be further developed to support and integrate with future monitoring reports, particular in terms of the implementation of the RSES spatial strategies and public funding/ investment. For example, the RDM could track and compare progress on agreed key indicators across the three regions to inform the respective monitoring reports.

The response rate from public bodies across the three monitoring reports was lower, at an average of 65%. This prompted the EMRA to include a specific recommendation to put in place mechanisms to ensure the fulfilment by public bodies of their statutory obligations under Section 25A and Section 22A in respect of reporting and assisting on implementation of the RSES.

A number of the responses from the public bodies are also difficult to assess in terms of actual progress relating to specific RSOs/overarching objectives and RPOs of the RSESs. Many of the responses contain repetition and information that is of questionable relevance to the purpose of the monitoring report. For example, the responses contain a lot of information about what each department does, including its key programmes and funding initiatives, which often isn't linked to specific strategic outcomes or policy objectives in the RSESs. There are exceptions to this, such as the information presented from Eirgrid, which refers to progress on strategic infrastructure under specific RPOs.

The responses are also not sufficiently focused on the spatial nature of the RSES. This makes it difficult to assess how initiatives, policies and investment decisions are aligned with the spatial strategy for each of the regions.

There is potential, however, for the regional assemblies to review their engagement with public bodies as part of the monitoring report process to ensure a more focussed and purposeful response from the relevant bodies.

Key Finding: Engagement with public bodies

Engagement with public bodies would benefit from greater focus on both specific RPOs/RSOs and the spatial strategy of the RSES (for example a breakdown of investment for cities, regional growth centres, and key towns). The Regional Assemblies might consider a uniform approach to how this could be best achieved, for example by identifying key relevant RPO/RSO and tailoring the request to individual public bodies.



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