

Deputy Stephen Matthews, T.D

Chair Joint Committee on Housing, Local Government & Heritage

Leinster House

Dublin 2

D02 XR20

Tel: (01) 6183325

Cc Anne Marie Lynch, Clerk to the Committee

Cc Paul Hogan, A/Assistant Secretary, Planning Division, Department of Housing, Local Government and Heritage

Re: Draft Planning and Development Bill 2022

Dear Deputy,

On behalf of the Regional Assemblies, we wish to thank the Joint Committee on Housing, Local Government and Heritage, for the invitation to make a written submission to the pre-legislative scrutiny stage of the Draft Planning and Development Bill 2022. This written submission follows on from our oral submission given to the Committee on 21st February 2023.

This submission has been prepared and represents the view of the executives of the Regional Assemblies and has been noted by the Assembly Members of each Regional Assembly.

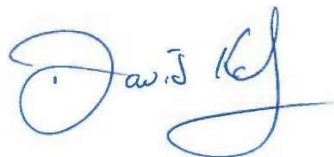
Should you have any queries relating to this submission please contact the undersigned.

I would appreciate if you could acknowledge receipt of this submission at your earliest convenience.

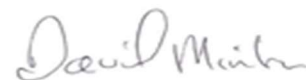
Kind Regards,



Jim Conway
Director
Eastern and Midland Regional
Assembly (EMRA)
jconway@emra.ie



David Kelly
Director
Southern Regional Assembly
(SRA)
dKelly@southernassembly.ie



David Minton
Director
Northern and Western
Regional Assembly (NWRA)
dminton@nwra.ie

Submission of the Regional Assemblies to the Joint Committee on Housing, Local Government and Heritage on the Draft Planning and Development Bill 2022

1. Introduction

The Regional Assemblies represent the regional tier of Government in Ireland, and play a central role in the Planning system, linking the National Planning Framework (NPF) with local plans, through Regional Spatial and Economic Strategies (RSEs), which are made by the respective members of each Regional Assembly.

The Regional Assemblies strongly welcome this comprehensive review of Ireland's Planning legislation and the publication of the Draft Bill, which identifies a number of new responsibilities for regional assemblies indicating a solidification of regional planning and reflecting growing confidence in Regional Assemblies since their establishment in 2014.

Our comments below address sections of the Draft Bill that relate to regional planning and the functions of the Regional Assemblies, and where we consider improvements to the legislation can be made in this regard. Our overall objective in making such comments is to strengthen regional spatial and economic policy formulation and delivery through Regional Assemblies, enabling strategic decision making and implementation of proper planning and sustainable development at the regional tier.

2. Consistency across suite of Plan Led Policy (various sections of the draft Bill relate as indicated below)

The Assemblies welcome the continued focus on plan-led development in the draft Bill and the signalling it provides for the growing role of the Regions therein, as provided within Part 3 of the Draft Bill - which deals with 'Plans, Policies and Related Matters'. Plan led policy is to be delivered through Chapter 2 (National Planning Framework), Chapter 3 (National Planning Statements), Chapter 4 (Regional Spatial & Economic Strategies (prepared by Regional Assemblies)), Chapter 5 (Development Plans) and finally, Chapter 6 (Urban Area Plans/Priority Area Plans & Joint Plans).

A number of amendments/insertions are considered necessary to strengthen the legislative provisions so that they coherently prescribe the suite of policy frameworks required to provide effective plan led development. These are set out below:

a) Chapter 2: National Planning Framework (NPF) s18-21

'Balanced Regional Development' is one of the three core objectives of the current Planning Act. The terminology has since shifted to effective regional development that has now been deeply engrained within the suite of national, regional and local plans, since the adoption of the NPF in 2018.

Section 20 B (b) of the current Act states that the Objective is to '*secure balanced regional development by maximising the potential of the regions, and support proper planning and sustainable*

development'. However, one of the five objectives in the draft Bill refers to '*securing national and regional development strategies, including maximising the potential of the regions;*'. This wording we feel weakens the objective of delivering *effective regional development*. The NPF is the first time that the state has meaningfully attempted to do effective regional development, where the philosophy of 'funds follow policy' was to some extent brought into effect. With the adoption of RSEs in 2020, we are only 2-3 years into implementation, and it must be given time to allow the NPF and the RSEs to be implemented. To dispense with this fundamental commitment to effective regional development in this legislation is not acceptable.

- *The assemblies ask that securing effective regional development be stated as an individual core objective in s18 of the Draft Bill.*

b) Chapter 3: National Planning Statements

National Planning Statements, under s 23 and s24, can set guidance for the preparation of Regional Spatial and Economic Strategies and for a range of other planning matters that relate to the function of regional assemblies. It is important that the role and relevance of National Planning Statements for the regional tier of planning is referenced, not just their role for the performance of functions by Local Authorities or the Commission solely.

Under s24(1)(m), a provision allows the Planning Statement to address performance by planning authorities and the commission. It should be applied consistently to all actors including Regional Assemblies. Thus, this sub-section should state under (m) '*the performance by planning authorities, the Commission and the Regional Assemblies of any of their functions under this Act.*'

- *The assemblies ask that s24(1)(m) be amended to state 'The performance by planning authorities, the Commission and the Regional Assemblies of any of their functions under this Act.'*

c) Chapter 4: Regional Spatial and Economic Strategies (RSES)

s.27: Under this section the process for preparing an RSES is being prescribed. It requires the RSES to be prepared in a manner that supports firstly the implementation of the National Planning Framework, and secondly the economic policies and objectives of the Government. The RSES is clearly meant to provide a strategy that integrates the spatial planning elements of government policy with the economic elements of government policy.

S27 of the draft Bill currently requires that the RSES be '*materially consistent*' with the National Planning Framework, the National Marine Planning Framework, and thirdly any relevant National Planning Policies and Measures that have been issued by the Minister.

The current Planning and Development Act requires that the RSES be consistent with the National Planning Framework and the economic policies and objectives of the Government (Rf. s25(3)). We welcome the inclusion of s 27(2)(c) which states a regional spatial and economic strategy shall be in accordance with (b) the economic policies and objectives of the Government. However, in further sections, although the draft Bill mandates that the RSES be consistent with the National Planning Framework, the National Marine Planning Framework, and thirdly any relevant National Planning Policies and Measures that have been issued by the Minister (s27 (5)), it does not require consistency with the economic policies and objectives of the Government. The inclusion of this provision is

essential, in order to provide for coherence and consistency in the integrated implementation of economic policy and spatial planning at national, regional, and local levels.

- The assemblies would ask that consistency is required with the economic policies and objectives of the Government across the Bill as follows:
 - (i) Insert as **s27(5)(d) the economic policies and objectives of the Government.**
 - (ii) Insert as **s28(1)(p) the economic policies and objectives of the Government.**
 - (iii) Insert as **s29(2) (a)(iv) the economic policies and objectives of the Government.**
 - (iv) Insert as **s31(2) (a)(iv) the economic policies and objectives of the Government.**
 - (v) Insert as **s37(2) (b)(iv) the economic policies and objectives of the Government.**
 - (vi) Insert as **s37(3) (e) the economic policies and objectives of the Government.**
 - (vii) Renumber s37(3)(e) as **s37(3)(f)**
 - (viii) Insert as **s 37(4)(d) the economic policies and objectives of the Government.**
 - (ix) Insert as **s 37(8)(a)(iv) the economic policies and objectives of the Government.**

d) Other matters

s28(1) of the draft Bill specifies the matters to be provided for within the RSES. At subsection 28(1)(d) reference is made to the location of housing and also references population distribution but the wording could be made clearer. The Assemblies would further consider that the matter should be described as providing for the ‘strategic location of housing’ as otherwise the focus may be inferred to be more local, which would be contrary to the principle of subsidiarity.

- *The assemblies ask that s28(1) be amended so that it addresses ‘strategic location of housing’ and to clarify references made to population distribution therein.*

The Assemblies note that the matter of population targets and the geography of their distribution is not prescribed as a matter to be provided for within the RSES. This should be inserted in advance of the ‘strategic location of housing’ referenced at s28(1)(d) as housing needs are predicated upon population targets.

- *The assemblies ask that the draft Bill be amended to prescribe population targets and the geography of their distribution as a matter to be provided within the RSES.*

S28(1)(m) of the draft Bill prescribes the economic matters to be considered and they are light in comparison to those that currently apply, as provided within s23(2) of the current Act. These should be supplemented.

- *The Assemblies ask that the economic matters to be provided within s28(1)(m) to be supplemented and to include:*
 - (i) *enabling the conditions for creating and sustaining jobs*
 - (ii) *enhancing regional innovation capacity, including investment in research and development capacity, technology transfer between third level education and enterprise, and up-skilling and re-skilling*
 - (iii) *support key sectors of the economy, in particular, the foreign direct investment, indigenous industry, small and medium enterprise, tourism, agriculture, forestry, marine and other natural resource sectors*
- *The assemblies ask that the definition of ‘key economic driver’ is clarified in s28(9)*

- *The assemblies ask that s342 is extended to include Regional Assemblies- ensuring that they have all such powers of examination, investigation and survey as may be necessary for the performance of its functions under this Act, especially in relation to addressing the content of the RSES under s28 (1).*

In view of the need to prepare a strategy that is consistent with the economic policies of government, it is important that the Bill also prescribes the role of public bodies in the preparation, monitoring, reporting and delivery of their plans, programmes and strategies so that they are materially consistent with the RSES. This matter is dealt with in further detail in Section 4 below.

e) Part 3, Chapter 5

The Development Plan making process in the current Act, including the Variation process, requires that Regional Assemblies be consulted, that they prepare reports under s27A (preparation of draft development plan); s27B (draft development plan); and s27C (variation). The reports are to include recommendations to the planning authority on how consistency with the RSES can be achieved. The planning authority is required to summarise issues raised and outline recommendations of the Chief executive in relation to the manner in which these issues and recommendations should be addressed (Rf. s11(4)(bc) for pre-draft; s12(4)(bc) for draft development plan; and s13(4)(bc) for variation. It also requires that where Members decide not to comply with any of the recommendations of the Minister, the Office of the Planning Regulator or the Regional Assembly, that they provide notification to them of the reasons for the decision.

The draft Bill has in general reflected the approach in the current Act but gaps have arisen in respect of the prescribed role of the Regional Assemblies.

Pre-Draft Stage: Under s54 (8) of the Draft Bill, Regional Assemblies have a role in the review of Development Plans (pre-draft stage) which reflects the current Act and is appropriately captured within the draft Bill.

Draft Plan Stage: s55 prescribes the steps to be taken in the preparation of the Draft Development Plan (draft plan stage) and whilst it captures, at s6(c)(iv), the requirement for the Chief Executive to prepare a report that summarises the issues raised in the submissions made by the regional assembly and to outline the recommendations of the chief executive in relation to the manner in which those issues should be taken account of in the development plan, it fails to prescribe that:

- (a) The Regional Assembly prepare a report and recommendation to the planning authority setting out what measures, if any, need to be taken to make the draft plan consistent with the RSES; and*
- (b) Where members decide not to comply with a recommendation(s) of the Regional Assembly that they inform the Regional Assembly by notice in writing of the reasons for not complying with the recommendation or recommendations concerned.*

Material Amendments Stage: Furthermore, in s54(8) the process to be followed is prescribed where the members of the planning authority amend the draft plan under subsection (7)(c) and the amendment made constitutes a material alteration of the draft concerned. In this situation, the draft Bill fails to prescribe not only (a) and (b) above but also fails to require:

- *The Chief Executive to prepare a report that summarises the issues raised in the submissions made by the regional assembly and outline the recommendations of the chief executive in*

relation to the manner in which those issues should be taken account of in the development plan.

This inconsistency in process weakens the legislative structure of the Act and its ability to achieve consistency with the RSES and NPF.

In order to achieve a greater degree of consistency the Bill should be amended and one option to achieve this would be to amend the following provisions:

1. **Amend s55(3)** to state: The Minister, the Office, or the Regional Assembly may, in relation to a draft development plan, make such recommendations as the Minister, the Office or the Regional Assembly, as the case may be, considers appropriate.
2. **Insert new subsection** after 55(6)(c)(ii)(II): Any recommendations, submissions or observations made by the Regional Assembly.
3. **Amend s55(6)(c)(vi)** to state: Set out the recommendations of the chief executive as to how any recommendations made by the Minister, the Office and the Regional Assembly should be taken into account of in the development plan,
4. **Delete s55(6)(c)(vi)** as No.3 above addresses same.
5. **Amend s55(9)** to state: The Minister, the Office, or the Regional Assembly may, in relation to a draft development plan, make such recommendations as the Minister, the Office or the Regional Assembly, as the case may be, considers appropriate.
6. **Insert new subsection** after 55(12)(c)(ii)(II): The recommendations, submissions or observations made by the Regional Assembly in relation to the material alteration and any strategic environmental assessment or appropriate assessment of the alteration.

The draft Bill provides for the making of Urban Area Plans, Priority Area Plans and Joint Area Plans, which are a new feature. The draft Bill provides that they must be consistent with the development plan and the RSES. As these plans may give rise to issues of consistency the **assemblies would ask that the Bill provide for reporting and notification at each stage of the process that reflects those of Development Plans and Variations as referred to in the bullet-point above.**

3. The RSES Content and Processes (Sections 28, 29, 30, 31 and 32 of the Bill)

The Regional Assemblies welcome the sections of the Bill that relate to the content and processes associated with a regional spatial and economic strategy. Whilst the Assemblies recognise the positive attributes of the above-mentioned sections of the Bill, it is considered that the following points should be taken into consideration in advance of finalisation of the legislation;

- a) The Assemblies welcome the inclusion of the list of matters that a regional spatial and economic strategy shall make provision for as stated at section 28(1) of the Bill, marking a positive signalling for regional planning. The Assemblies note the inclusion of new matters including section 28(1)(I) involving a strategy relating to landscape and landscape character that coordinates the categorisation of landscapes, in terms of their capacity to absorb particular types of development, across the region so as to ensure a consistent approach to the protection of the landscape. Whilst the Assemblies welcome this matter, it is considered that to avoid ambiguity and to ensure consistency across the Regions, **reference should be**

made that this be considered in line with national landscape parameters determined at national level.

- b) **Greater clarity on the timeframes associated with the stages relating to the preparation/making of a regional spatial and economic strategy or revision to an existing strategy would be beneficial for Regional Assemblies.** This may take the simplistic form of time limits within which the aforementioned processes should be completed, in order to provide certainty to key stakeholders including elected members of the Regional Assemblies who are responsible for the making of a regional spatial and economic strategy or a revision to an existing strategy. Given the complexities of the processes involved, the Regional Assemblies recommend that the timeframe related to the process for the making of a new regional spatial and economic strategy is **not less than two years with provision to extend such period in consultation with the Minister.**

4. Monitoring, Implementation and Delivery (Section 34 of the Bill and Sections 25A and 22A of the Planning and Development Act 2000, as amended- see also Section 28(13) of the Bill)

The Regional Assemblies note the inclusion of Section 34 of the Bill relating to Implementation and monitoring of a regional spatial and economic strategy. Whilst the Assemblies note that as part of this section 'a regional assembly shall keep under review the implementation of the regional spatial and economic strategy for its region', and notwithstanding the provision of Section 28(13) of the Bill, it is considered that the provisions of Section 34 are not robust to enable meaningful monitoring, implementation and delivery of a regional spatial and economic strategy and the following points should be taken into account in finalising this section;

- a) The Assemblies consider **that the proposed four-year timeframe related to the preparation of a monitoring report is too long** and will not enable effective monitoring of the RSES. This reporting cycle has changed from the two-year provision outlined at Section 25A of the Planning and Development Act. The Assemblies do, however, **welcome the use of successive timeframes** for the submission of a progress report from the local authorities (S 34(2) of the Bill) and the preparation of the monitoring report by the Assemblies.
- b) The Assemblies note that as part of Section 34 of the Bill, **the requirement for public bodies to prepare and submit a progress report to the Assembly**, as currently required under Section 25A. (1) of the Act, has been removed. The Assemblies consider this to be retrograde step as public bodies (departments, bodies and agencies) play a significant role in implementing the development objectives of the RSES and should be required to prepare a report on progress made in implementing the RSES, as they have done so under the current provisions of the Act.

In addition to the above, and notwithstanding Sections 30(10) and 30(12) of the Bill, the Assemblies consider that the **provisions of Section 22A. of the current Planning and Development Act should be reinstated** as part of national planning legislation in order to ensure coordination of regional spatial and economic strategy preparation and implementation with the strategies, plans and programmes of public bodies, and importantly

that this applies vice versa. Successful implementation and delivery of a regional spatial and economic strategy, as past experience of the previous National Spatial Strategy and Regional Planning Guidelines demonstrates, depends on ensuring that actors with responsibility for delivery, at all times subscribe to the same worldview and agreed approach to avoid random, ad-hoc and reactive decision making, that undermines implementation and delivery.

- c) The Assemblies note that the content of the progress report to be submitted by a local authority under Section 34(2) of the Bill includes setting out progress made in supporting objectives, relevant to that local authority, of the regional spatial and economic strategy. As indicated at the session of the Joint Oireachtas Committee which was attended by the Assemblies and CCMA on 21st February 2023, this Section of the Bill may **provide opportunity to monitor housing delivery on residentially zoned lands**, should the Committee be minded to include such provision in the legislation. This would be in line with Section 28(1)(d) of the Bill which requires a regional spatial and economic strategy to make provision for the location of housing, including provision to meet any national and regional population growth targets set out in the National Planning Framework as between the functional areas of the planning authorities in the region and the relevant population and housing targets to be included in the housing delivery strategy of each planning authority. This may also facilitate the elimination of duplication of efforts in reporting requirements for local authorities.
- d) The Assemblies consider that there is need for **additional legislative provisions that enables the implementation of a regional spatial and economic strategy by a regional assembly**. As per Section 34 of the Bill, the statutory implementation powers of a regional assembly are limited to;
- ‘Keep under review the implementation of the regional spatial and economic strategy’,
 - receive a report from local authorities setting out progress made in supporting objectives, relevant to that local authority, of the regional spatial and economic strategy, and
 - to prepare a monitoring report monitoring progress made in implementing the regional spatial and economic strategy.

It is considered that the Bill should include provision that explicitly enables a regional assembly to actively initiate implementation in their own right, in so far as their power relates, including **to convene implementation forums to advance the implementation of the regional spatial and economic strategy**. This would allow a regional assembly to further the coordination of regionally significant measures and the cooperation between public bodies (departments, bodies and agencies), local authorities and other relevant entities. Such provision would also enhance and inform the monitoring report indicated at Section 34(3) and (4) of the Bill, and advance the objectives to secure the effective implementation and monitoring of the regional spatial and economic strategy and metropolitan area strategic plan as outlined, in accordance with section 28(13) of the Bill.

5. Metropolitan Area Strategic Plans (Section 28 (2- 5 and 7))

The Regional Assemblies strongly welcome the reference to Metropolitan Area Strategic Plans (MASPs) in Section 28 of the Bill reflecting the importance of the metropolitan areas as foundations

of the NPF, and the need for a specific planning, coordination and investment framework for the cities given the transformative change required in each and cross boundary issues evident at local level.

The following points/clarities are identified:

- a) While welcoming the reference to MASPs in the bill it is noted that the relevant content is light by contrast to for example with guidance included for Urban Area Plans. Given the strategic importance of the MASPs it is **considered that greater weight should be given to them in the legislation including reference under Section 24 (1)(a) relating to National Policy Statement** and a strong signal included regarding their role as a basis for implementation.
- b) Section 28 (3)(a-e) identifies that MASPs should be prepared for the five existing cities for inclusion within the RSES. Section 28 (3)(f) refers to the inclusion of 'other cities as may be prescribed'. Given their national significance **the appropriate mechanism for identification of additional cities (if required) is through legislation** following consideration through the National Planning Framework review process and not any other means.
- c) Section 28 (4) & (5) refers to the **designation of boundaries for each MASP** by the Regional Assemblies and that this *'means the area consisting of the city and its surrounding area approximating to the extent of its commuting zone'*. There are concerns a) regarding any extensive redesignation of MASP boundaries and b) the reliance on 'commuting zones' as the sole definition for this. We are currently on the path to 2040 with strong alignment between national, regional, and local planning, infrastructure planning, water investment, transport strategies aligned to boundaries set under the NPF and therefore **any significant boundary changes should only be undertaken in limited and justified circumstances and based on consistent criteria**.

The reliance on 'commuting zones' in its broadest sense is not appropriate nor should it be the sole criteria. We are striving for 50% reduced carbon emissions in transport and investing heavily in metropolitan transport networks and public transport catchments should be to the fore in consideration of metropolitan issues. The NPF (P134) uses a much broader definition referencing functional areas, commuting patterns, geographic features, and boundaries used in transport strategies. Therefore, it is considered that a) safeguards should be included to ensure that consistent criteria are used for identification of all MASPs across the three assemblies b) that these should reflect broader criteria such as those referenced in the NPF. Finally, it is considered that these criteria address in the first instance in the review of the NPF and/or through Section 24 (1)(a) relating to National Policy Statements.

- d) The Assemblies note that at s28(2)(b), s28(4)(b) and s28(7) the draft Bill provides that the MASP shall be consistent with the RSES but the language needs to be tempered to reflect that a MASP is an integral part of the RSES and it would be of benefit if this was either deleted or amended to state that the 'A RSES and any metropolitan area strategic plan within such a strategy, shall be internally consistent and coherent'.

6. Regional Growth Centres (Section 28)

The Assemblies strongly welcome the designation of ‘Regional Growth Centres’ within the Act, as the core objective of the legislation is to support effective regional development and the National Planning Framework has confirmed that the weak urban infrastructure in the state represents a barrier to effective regional development. A number of settlements have been designated in the NPF as regional centres because they perform city like functions, albeit at a smaller scale. It is the view of the Assemblies that these regional growth centres should be prescribed in the Act, reflecting the provisions of the NPF, rather than consigning their designation to the RSES making process. This would require the designation of Athlone, Drogheda, Dundalk, Letterkenny, Sligo in a manner similar to the designation of cities, in s28(3) – including the provision enabling other regional centres as may be prescribed. This would require the provisions of 28(8) of the draft Bill to be amended.

- The Assemblies ask that the draft Bill designate Athlone, Drogheda, Dundalk, Letterkenny, and Sligo in a manner similar to the designation of cities, in s28(3) – including the provision that enables other regional centres as may be prescribed through NPF or National Planning Statements.

The draft Bill should also provide for the preparation of Regional Centre Strategic Plans, within the RSES, in the same way that provision is made for Metropolitan Area Strategic Plans (MASPs) for the cities.

- The Assemblies ask that the draft Bill provide that the RSES shall include Regional Centre Strategic Plans (RCSPs), similar to MASPs and prescribe their content.

In addition, it is noted that s28(8) provides for the designation of regional centres **or** key towns. The legislation should enable key towns to be designated within the RSES, separate from the designation of regional centres. Key towns, of regional significance, perform a supportive role to cities and metropolitan areas and regional growth centres and the RSESs recognise and support them within regional policy.

7. Joint Area Plans (Section 28(10-12))

The Regional Assemblies welcome the inclusion of legislation that relates to Joint Area Plans. This includes conditions for a regional assembly to specify provisions for joint area plans where a settlement, or the part of the urban area of a settlement is within the functional area of more than one planning authority, and (b) the regional assembly considers that the growth of the settlement, or the part of the urban area of a settlement, concerned is important to the population growth or employment growth of one or more of the relevant functional areas. The provisions specified at Section 28(10) are strongly welcomed in this regard and are considered extremely beneficial in progressing plans that cross administrative boundaries of different planning authorities.

It should be noted however, that there are instances whereby a Joint Area Plan will not only cross the administrative boundaries of different planning authorities, but also will cross the administrative boundaries of different regional assemblies. Athlone located in Counties Westmeath and Roscommon, and, at a regional level, within the Eastern and Midland Region and the Northern Western Region is one such example, with Carlow being another example, crossing counties Carlow and Laois and the Southern, and Eastern and Midland Regional Assemblies.

In light of the aforementioned point and to remove any ambiguity from the provisions of Section 28 (10-12) of the Bill, **the Bill should clarify which regional assembly, and subsequent regional spatial and economic strategy, is principally responsible for guiding the provisions set out in Section 28 (10-12) of the Bill and any related provisions**, in circumstances where Joint Area Plans cross the administrative boundaries of regional assemblies.

8. Governance (Section 30(4))

The Assemblies note the provisions of Section 30(4) of the Bill relating to the making of such arrangements as may be necessary for the making or revision of a new regional spatial and economic strategy with the assistance and cooperation of local authorities. The Assemblies **consider that the establishment of committees to oversee and consider the preparation of the RSES or its revision, including defining the roles of those committees as specified at Section 30(4)(d), is a retrograde step.** The stated role of these committees, to be agreed with local authorities, includes considering observations received including under S31 (preparation of the draft or draft revision) and drawing up reports in respect of the strategy or revision. The Assemblies consider that this inclusion may erode the ‘reserved function’ of the elected members of a regional assembly and introduce a risk to the process given that many of the submissions will come from the Local Authority sector itself. **The Regional Assemblies consider that the inclusion of the aforementioned section of the Bill marks a significant departure from Section 22(1-2) of the Planning and Development Act 2000, and the preferred option is continued cooperation with local authorities, led by regional assemblies, through the use of technical working groups.**

9. Resources

As indicated at the session of the Joint Oireachtas Committee attended by the Assemblies on 21st February 2023, the resourcing of the planning sector is paramount to enable the sector, including Regional Assemblies, to undertake their duties in a professional and satisfactory manner.

The Regional Assemblies have gained a number of new functions as part of the Planning Bill that are welcomed and considered to reinforce regional planning, providing a coherent approach across different policy levels from national, regional to local, and also across key policy areas including housing and climate.

Should the Committee be minded **to consider the staff arrangements** of the planning sector further as part of the Bill (as is the case in the Draft Bill at Part 17, Chapter 5, Section 422 relating to An Coimisiún Pleanála, and, Part 18, Chapter 3 relating to the Office of the Planning Regulator), the Regional Assemblies would strongly recommend that they are included as part of this consideration, particularly having regard to the unique and specialised role that they carry out within Ireland’s planning system.

10. Conclusion

The submission above expands and builds on the Witness Statement and the inputs from the Regional Assemblies to the Joint Committee on Housing, Local Government and Heritage at its meeting of February 21. The Regional Assemblies may take the opportunity to make further submissions on other elements of the Draft Bill pertaining to their functions through relevant channels as appropriate.

ENDS.