


Infrastructure Update 2025: Recent Policy Developments



The Irish government recently announced some significant policy changes and developments on the delivery of infrastructure in Ireland, including the revised National Development Plan (the “**NDP**”), which reflect its view of the importance of infrastructure in maintaining Ireland’s economic competitiveness.



THE NATIONAL DEVELOPMENT PLAN

The recently announced revised NDP recognises infrastructure delivery as a key priority for the Irish government. The NDP is Ireland’s largest ever long-term strategic capital investment plan delivering a total public capital investment of €275.4 billion over the period 2026 – 2035, and includes equity funding of €10 billion to 2030 to fund large strategic projects in energy, water and transport.

Key investments include:

- enhancing the electricity grid with €3.5 billion for EirGrid and ESB Networks to expand electricity transmission and distribution network infrastructure;
- a €24.3 billion investment in the transport sector. In particular, €2 billion of the Infrastructure, Climate and Nature Fund (“**INCF**”) for the commencement of the construction of the Dublin Metrolink project (to be partially delivered by PPP);
- the delivery of 300,000 new homes by 2030; and
- a total €12.2 billion investment in water and wastewater infrastructure with equity funding of €2 billion to Uisce Éireann to support the planned development of new homes by 2030 and €2 billion for Uisce Éireann’s large scale water projects to 2030.



INFRASTRUCTURE DIVISION

The newly established infrastructure division in the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation recently announced that it is carrying out an assessment of barriers impeding efficient infrastructure development. An Accelerating Infrastructure Taskforce (the “**Taskforce**”) has also been established to monitor the implementation of measures to accelerate infrastructure delivery. The Taskforce is a mix of 12 senior industry leaders including from utilities, industry, advisors, and semi-state bodies. It is the first of its kind in Ireland with a mandate to provide recommendations to address infrastructure delivery issues (eg, planning, procurement, funding models etc) as quickly as possible. It will report back to Government with firm recommendations in autumn. The Taskforce will provide strategic guidance to accelerate infrastructure delivery and reforms that are designed to remove the barriers that the Taskforce identifies. Interestingly, the Taskforce has already identified potential misuse of the judicial review process as a barrier to infrastructure delivery¹.

¹ https://assets.gov.ie/static/documents/Report_on_Engagement_and_Barriers_to_Infrastructure.pdf, page 28



THE NPF

The NPF, revised earlier this year, is Ireland's 20-year strategy for strategic planning and sustainable development in urban and rural areas. It further strengthens policy support for infrastructure.

The National Policy Objectives, contained in the NPF, promote infrastructure projects in areas such as district heating, housing, water services infrastructure, sustainable transport projects, offshore renewable energy projects and port infrastructure.



THE NATIONAL PROCUREMENT STRATEGY

A public consultation to develop Ireland's first national procurement strategy was carried out in May 2025. The new strategy seeks to increase transparency, value for money and digitalisation in public procurement. The consultation follows the European Commission's evaluation of EU Public Procurement Directives and the Commission are to provide an update later this year. Although we don't yet have precise details, it is likely that there will be changes to the tendering processes for major infrastructure projects such as increased reporting obligations, transparency and efficiency in tender processes.



THE PLANNING ACT

The Planning and Development Act 2024 (the "**Planning Act**") was signed into law by President Higgins on 17 October 2024, but is not yet fully commenced. The Planning Act includes a number of provisions which may impact infrastructure delivery in Ireland.

For example, it will impose additional requirements on organisations bringing judicial review proceedings such as a requirement to have 10 members (minimum) and to exist for at least one year before bringing proceedings. These requirements impose additional hurdles on those challenging planning permissions for major infrastructure projects such as roads, public transport projects or housing developments.

Other notable developments include the imposition of timelines for the consenting process for developments. For further details please see our [Insight Irish Planning Legislation Overhauled - Yet To Be Implemented](#).





PPPs AND RECENT GUIDELINES

As outlined above, Metrolink has been allocated €2 billion under the NDP. A significant part of Metrolink will be funded, built and operated by way of a Public Private Partnership (“**PPPs**”). PPPs continue to play a key role in the development of infrastructure in Ireland, with the Government utilising PPPs to assist with the procurement and development of public infrastructure across all sectors. PPPs may form part of the delivery of the strategic infrastructure projects under the NDP and on that basis, stakeholders should note recent guidance relevant to PPPs set out below.



PPP GUIDELINES

The Irish government developed Guidelines for the use of Public Private Partnerships (the “**PPP Guidelines**”) in 2019 which encourage the use of PPPs by requiring state bodies acting as sponsoring authorities to consider procuring projects which exceed €75 million via PPP.

The PPP Guidelines were supplemented by the Infrastructure Guidelines in 2024 which aim to reduce the administrative burden in delivering major capital projects. The Infrastructure Guidelines provide a structured approach to planning Departmental capital investment programmes and streamline the approval process for PPPs. PPPs are subject to three ‘Approval Gates’ which are approval process stages which must be fulfilled to the satisfaction of the approving authority before a PPP is fully approved which include:

1. Strategic Assessment and Preliminary Business Case;
2. Pre-tender, including project design, planning and procurement strategy; and
3. Post-tender, Final Business Case.

For larger projects (in excess of €200 million) additional requirements apply eg, a requirement to obtain ministerial approval before the third ‘Approval Gate’. The Approval Gates were recently endorsed in the revised NDP as ‘best practice’ in the delivery of major infrastructure projects. It is important for stakeholders to consider the impact of the approval gates and any additional approvals required on project timelines when preparing PPP or other major infrastructure tenders.

Once a project has successfully passed through the Approval Gates, PPP tenderers should be aware that the PPP contract template used by the National Development Finance Agency (“**NDFA**”) (which oversees most PPPs) does not allow changes to the ownership of the PPP company during the first 24 months following contract award and in some instances, permanently.



An aerial night photograph of a city, likely Dublin, with its lights reflecting on the water and the mountains in the background. The city is densely packed with lights, and the water is dark with some reflections. The mountains are silhouetted against the night sky.

COMMENTARY

The recent policy developments as outlined above indicate that infrastructure remains a key focus for the Irish government. The support for and efforts to streamline public infrastructure delivery will be of interest to stakeholders. In parallel with these developments, the PPP market remains active in Ireland and will play an important role in achieving the delivery of priority infrastructure objectives.

Matheson's integrated cross-disciplinary Energy, Infrastructure and Construction team (including specialists in project development, construction, financing, planning / environmental, real estate, M&A and procurement) is the largest grouping of its kind in the Irish legal market.

If you have any questions on energy and infrastructure development, financing, regulation or transactions, please get in touch with the contacts listed below or your usual Matheson contacts.

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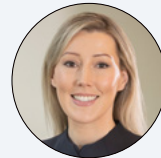


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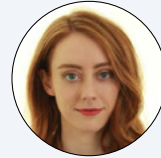


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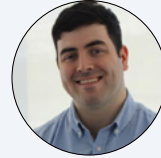


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