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### **Planning Policy and Decarbonisation**

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## Planning Policy and Decarbonisation

This discussion paper considers a number of elements of the planning system in Ireland. The Secretariat has had several engagements with the OPR and SEAI on specific issues which

would have the largest impacts on greenhouse gas (GHG) emissions with a view to creating the most useful discussion document. To address the different dimensions in a coherent fashion, this paper is structured as follows;

1. A brief outline of the role of planning, and the planning process via both the Local Authority and the An Bord Pleanála route.
2. A brief description of the underpinning legislation and proposals to update that legislation.
3. An exploration of issues faced by energy infrastructure in respect of planning processes.
4. An exploration of issues with respect to spatial development planning processes.
5. Summary and potential recommendations.
6. References.

In addition to this discussion paper prepared by the Climate Change Advisory Council Secretariat, a study was commissioned from Dr. Connor McGookin, on *Assessing the contribution of Local Authority Renewable Energy Strategies to the National renewable electricity targets for 2030*, which is also published on the Council's website as part of the Council Working Paper Series<sup>1</sup>. The study explores the potential mismatch between local authority ambition and national ambition which could hamper implementation and delivery of national targets.

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<sup>1</sup> See; <https://www.climatecouncil.ie/councilpublications/councilworkingpaperseries/>

## 1. Roles, Processes and Responsibilities in Planning

Both Local Authorities and An Bord Pleanála have a role to play in processing and deciding on applications. Figure 1 demonstrates the different tracks that a planning application can take, and consequently which body makes the final decision. Figure 2 illustrates the different bodies involved in setting planning guidelines, planning policy and area development plans that may be relevant in determining a final decision on a planning application. Section 2 describes the legislative basis for these in more detail.

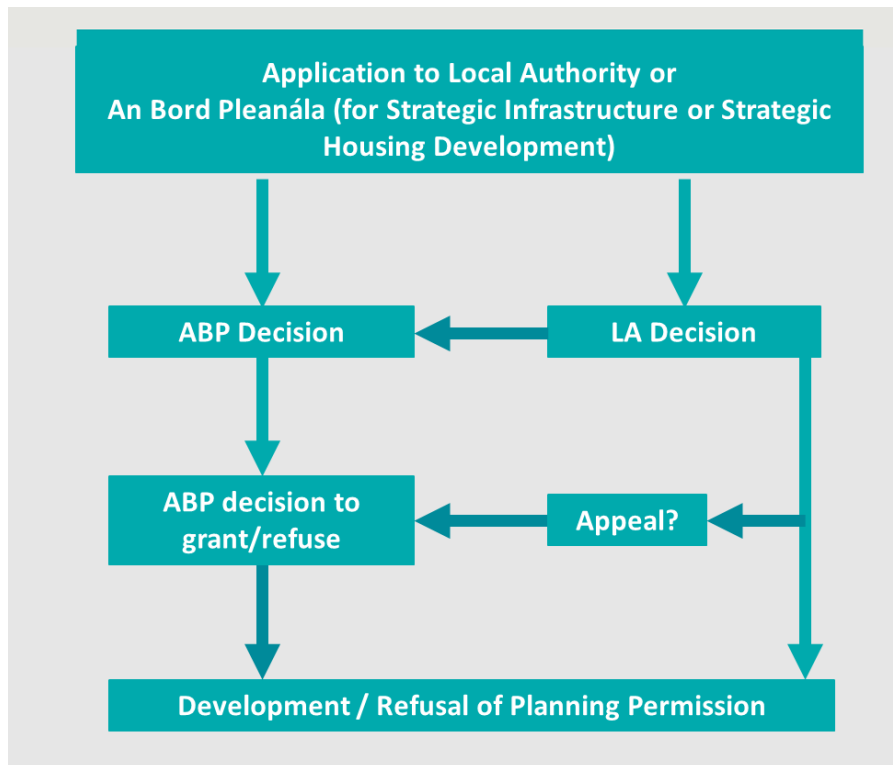


Figure 1. Planning Application Process (Source: OPR 2022)

# Planning System Ireland

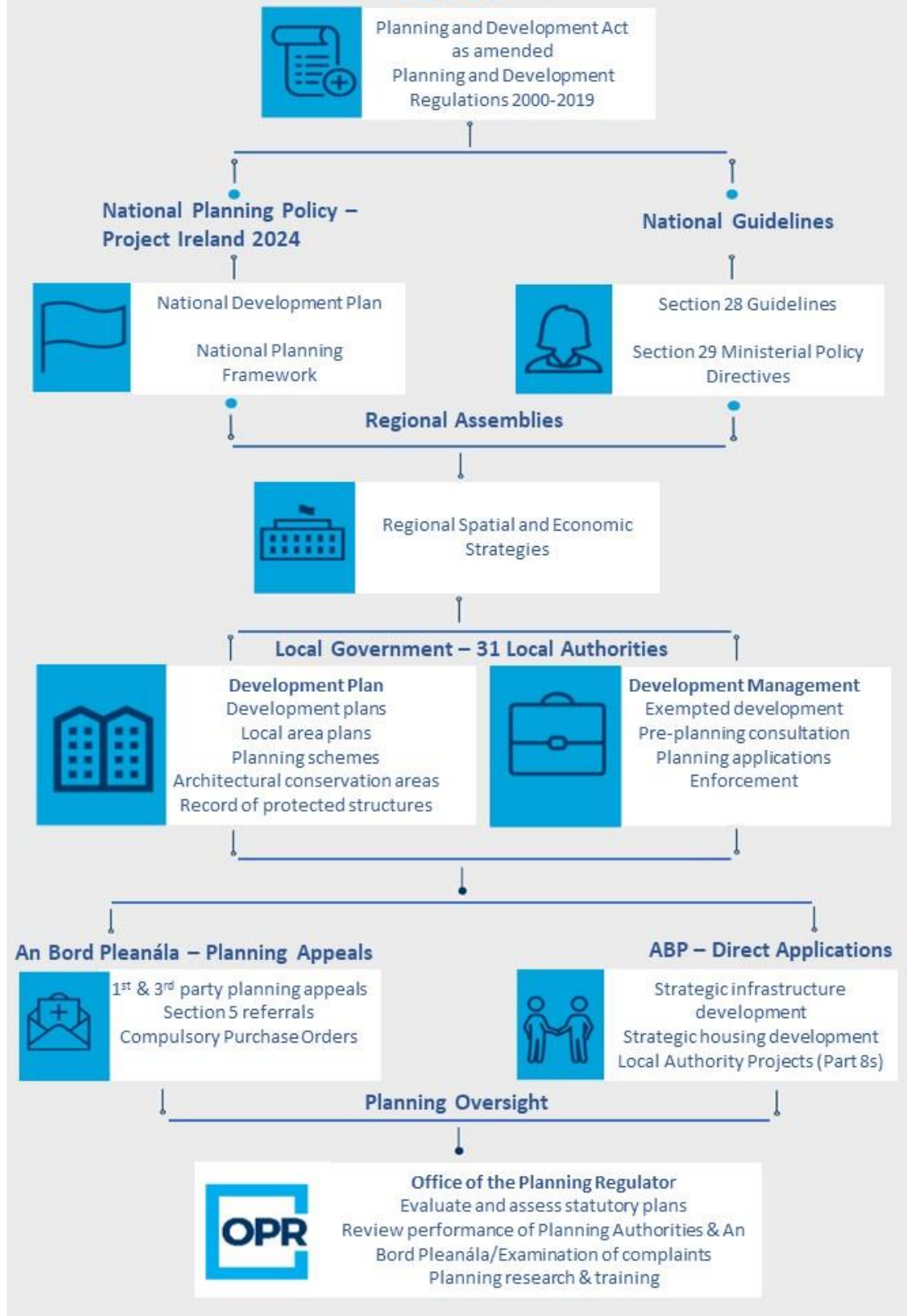


Figure 2. The Planning System in Ireland (Source: OPR 2022)

## 2. Planning Legislation

### 2.1 Existing Planning System

The National Planning Framework (NPF),<sup>[25]</sup> published in 2018 by the Department of Housing, Local Government and Heritage is the overarching long-term planning policy. Included in the NPF is a list of strategic national policy objectives which encompass the areas of

- compact growth
- enhancing regional accessibility through the national road network
- strengthening rural economies and communities
- sustainable mobility
- enhancing enterprise, innovation and skills capacity
- ensuring high-quality international connectivity through airports and ports
- enhancing amenity and heritage
- climate action by transitioning to a low carbon and climate resilient society
- sustainable management of water, waste and other environmental resources
- access to education, healthcare and childcare.

At the time of the NPF's conception, population growth was projected to increase by approximately one million people or by 20%, to almost 5.7 million people by 2040.<sup>[32]</sup> Thus, the framework and its ten strategic outcomes were based on this projection with consideration for the spatial distribution of these population projections. Regional parity, in terms of population growth, between the Eastern and Midland Regional Assembly area and the Northern and Western and Southern Regional Assembly is recognised as a key aspect of the strategy in order to deliver sustainable development. Strengthening compact urban development in Dublin, across the four cities of Cork, Limerick, Galway and Waterford and other regional centres is favoured over the continuation of urban sprawl. The NPF puts major emphasis on limiting this continual expansion by stating a specific target of 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. The remaining homes would be delivered at the edge of settlements and in rural areas. In rural areas, private single/one-off houses are characteristic of the development which commonly takes place.

Next in the planning hierarchy are the complementary Regional Spatial and Economic Strategies (RSES) implemented by the Regional Assemblies [Eastern and Midland Region, Southern Region, and Northern and Western Region]. Within these strategies there are policies and objectives relating to renewable energy, particularly around preparing regional renewable energy strategies and identifying potential renewable energy sites.

Underneath the RSES for each of the three regions, are the 31 Local Authority Development Plans which are further broken down into Local Area Plans. At each stage, the policies within the NPF must be taken into account.

The official bodies which oversee the planning system, and their responsibilities are outlined above in Figure 2.

Currently, the law governing the planning system is set out in the Planning and Development Act 2000, as amended and the Planning and Development Regulations 2001, as amended.

The purpose of the Act and its amendments is to:

- set out the procedures for applying for and obtaining planning permission
- define those types of development which are exempt from the planning process
- define the special requirements for protected structures, conservation areas and areas of special planning control
  - describe Strategic Development Zones and Environmental Impact Assessment
- set out the development plan process, at local and regional level
  - including regional planning guidelines and local area plans
- give a structure to planning and development contribution fees
- establish and govern the operation of An Bord Pleanála, Ireland's planning appeals body. <sup>[26]</sup>

The Department of Housing, Local Government and Heritage provide a collection of Planning Guidelines/Standards available to assist planning authorities and the public in understanding, guiding, implementing and abiding the planning legislation. In total, there are over 70 different documents from 1995 - 2022 which cover a range of areas within the planning system some of which are updates of previous guidelines, as requirements have evolved over time. Navigating these guidelines and manuals is laborious and it is not obvious which have been subsequently updated or superseded. Those which have the most impact on climate ambition for objectives such as sustainable compact growth, increasing and conserving biodiversity and strategic renewable energy developments include;

- *Development Plans - Guidelines for Planning Authorities (July 2022)* <sup>[16]</sup>
- *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (August 2018)* <sup>[22]</sup>
- *Design Standards for New Apartments (DSFNA) (2018)* <sup>[6]</sup>
- *Guidance Notes on Planning and Development Act 2000* <sup>[15]</sup>
- *Local Area Plans - Guidelines for Planning Authorities (June 2013)* <sup>[5]</sup>

- *Design Manual for Urban Roads and Streets (2019)*<sup>[13]</sup>
- *Sustainable Residential Developments in Urban Areas-Guidelines for Planning Authorities (May 2009)*<sup>[12]</sup>
- *Wind Energy Development Guidelines (2006)*<sup>[11]</sup>
- *Sustainable Rural Housing Development Guidelines (2013)*<sup>[10]</sup>
- *Strategic Environmental Assessment (SEA) Guidelines (2004)*<sup>[8]</sup>

There are also a number of relevant guidelines expected imminently:

- *Rural Housing Guidelines.*

It is hoped that these guidelines will bring greater clarity on one-off housing with the impact of renewable development and transport considered. The previous guidelines were published in 2005.

- *Sustainable and Compact Settlement Guidelines*<sup>[23]</sup>.

These guidelines are urgently needed to progress the related targets within the NPF.

- *Onshore Wind Energy Guidelines.*

These guidelines have been delayed for approximately 6 years but are urgently required as the previous guidelines were published in 2006 and are no longer fit for purpose in the scale of the current energy transition.<sup>[11]</sup>

In addition, the OPR has published a series of leaflets which simplify various aspects of the planning system.<sup>[39]</sup>

## 2.2 Noted issues with resourcing and capacity in the existing system

This section highlights the evidence base regarding resourcing and capacity as a fundamental issue within the existing planning system.

The National Competitiveness & Productivity Council's (NCPC) report on Ireland's Competitiveness Challenge 2021 first identified the resourcing and capacity issues within the planning system as a Medium- to Long-Term Challenge. A key recommendation in the report stated that, "*Capacity issues in the planning system will also need to be addressed and planning authorities need to be sufficiently resourced, so these processes do not delay the delivery of crucial housing and other crucial social and economic infrastructure (Recommendation 4.3)*" (NCPC, 2021).<sup>[33]</sup>

In the National Competitiveness & Productivity Council's report on Ireland's Competitiveness Challenge for 2022 the resourcing and capacity issues were raised again, this time in the



context of the climate crisis and scale of the energy transition needed. The necessity for an efficiently functioning planning system in this transition was emphasised in the report along with the recognition of possible and existing bottlenecks. The main constraint being the length of time to receive a grant of planning permission, particularly for an energy development, which is going far beyond the statutory 18-week window as highlighted further on in this report. On this basis the NCPC reiterated its 2021 recommendation in the 2022 report as it “*remains an issue and is driving delays in the delivery of infrastructure*” (NCPC, 2022). Further recommendations were made in the report to improve the capacity of the existing planning system in line with recommendations from the Attorney General’s review with insistence that “*priority is given to resourcing appropriately the special division of the High Court for planning and environmental matters*” (Recommendation 4.2) and to ensure that the regulatory system identifies and resolves delays to strategic energy infrastructure (Recommendation 4.3).<sup>[34]</sup> The establishment of this dedicated Planning and Environment division of the High Court is intended to facilitate greater efficiency and capacity within the planning and statutory consenting process.<sup>[28]</sup>

Wind Energy Ireland have been outspoken on the existing planning system’s failure to progress wind energy developments through the system at speed in line with climate targets. The industry representative group has persistently stated the existing planning system is “*fundamentally and utterly*” not up to the task.<sup>[45]</sup>

The insufficient resourcing of planning authorities as outlined in the reviews of Kildare,<sup>[41]</sup> Galway<sup>[40]</sup>, Louth<sup>[37]</sup> and Tipperary<sup>[38]</sup> County Councils published by the Office of the Planning Regulator in 2021 and 2022 is clear evidence of the resourcing and capacity issues being a major obstacle impeding the delivery of the planning services they are responsible for.

Ireland’s planning service is likely significantly under-resourced. While Budget 2023 did provide for an increase of funding of €5m for local authority planning functions, this is very significantly less than required.

Moreover, unlike most other comparable administrations as in the UK where planning services are significantly self-funding through user charges - planning fee income in Ireland is centrally controlled (by the Minister for Housing, Local Government and Heritage) and has not been amended since 2001, with the National Oversight and Audit Commission report for 2021 concluding that fees now account for just over 22% of the cost of running the service.

From an international perspective, the 2018 EU Renewable Energy Directive states that permit granting for wind and solar projects should take no more than two years. However, recent research has found that due to administrative delays Ireland has a permit granting time of six years, giving it a ranking of ninth out of 18 European countries.<sup>[21]</sup>

It will be challenging to address the many interdependencies between climate action and planning without addressing historic and structural underfunding of the planning process. There has been some progress in this area with the recent appointment of additional Board members to An Bord Pleanála. Subject to rapid progress on its wider recruitment plan, the basis for addressing its backlog of cases is being progressed.

In addition, in January 2023, a new training strategy for local authority planning staff was published which has been developed collaboratively by the Office of the Planning Regulator, the County and City Management Association (CCMA), the Local Government Management Agency (LGMA) and the Department of Housing, Local Government and Heritage. The strategy aims to deliver structured national level training for approximately 1,600 staff of the 31 local authorities who work in planning departments, alongside existing OPR training for elected members (OPR, CCMA, LGMA, 2023)<sup>[46]</sup>. This is based on findings of a Planning Service Survey which found that approximately 20% of respondents were less than one year in their role, with 40% between 1-5 years in their role<sup>2</sup>. The Department of Housing, Local Government and Heritage has also committed €400,000 in Budget 2023 to assist in implementing the strategy.

The administrative capacity, time limited consents and planning decision timelines are discussed further in the context of wind energy development in Sections 3.1, 3.2 and 3.3 respectively.

### 2.3 Recent Legislative Developments

A Draft Planning and Development Bill which aims to overhaul the planning system has been approved by government and was published on 26<sup>th</sup> January 2023 after a 15-month review led by the Office of the Attorney General.<sup>[17]</sup> The Bill is intended to bring greater clarity on planning policy, improve consistency with EU and national law and increase certainty on how planning decisions are made. It is designed to make the planning system more accessible and user friendly for the public and planning practitioners. The challenges around key infrastructure i.e., housing and renewable energy systems, aim to be addressed in this draft Bill with public participation and environmental protection informing the process.

An explanatory note with the draft Bill gave a summary outline as follows;<sup>[18]</sup>

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<sup>2</sup> A survey was sent to the approximately 1,600 local authority planning staff and to the 949 elected members, in relation to their views on training provision to date and training issues into the future.

- The legal status for Ministerial guidelines and policy directives will now be known as ‘National Planning Policy Statements’ and ‘National Planning Policy Guidance’ which will be approved by Government.
- Local Development Plans will be extended from 6 years to 10 years with Year 5 review. *“Plans will be more strategic in nature. They will give a strong sense of what is being planned for particular areas before any planning applications emerge. This will help ensure that public engagement and major local debate is focused on the plan-making rather than planning application stage. It will facilitate greater clarity and long-term visibility of planning outcomes. Local Area Plans will be replaced by specific types of area-based plans to meet particular needs (Urban Area Plans; Priority Area Plans; Joint Area Plans; Strategic Development Zones/Urban Development Zones)”*.
- Statutory mandatory timelines for all consent process, including ABP decisions will be introduced. This is intended to speed up the time taken for appeals and consents applications made to ABP including Strategic Infrastructure Developments such as wind energy developments. The timelines have not been indicated in the draft Bill yet, but it is stated that fines will be incurred if decisions are not met within these timelines. They will be introduced on a phased basis with timelines for Strategic Infrastructure Developments being prioritised first.
- Timelines for the various steps in Judicial Review process will also be introduced. In addition, ABP will be able to correct an error of fact or law in a planning decision and will be able to apply for a stay on the determination of Judicial Review proceedings whilst making such corrections. This should also streamline the appeals and review process. The Bill intends to bring clarity to the role of different parties in accessing justice including those who can apply for Judicial Review proceedings. *“In the case of applications for JRs by certain organisations, these will be taken by an individual or individuals.”*
- An Bord Pleanála will be restructured and renamed An Coimisiún Pleanála. This will result in an important separation of decision-making and the corporate/organisational roles and hopefully increase public confidence in the capacity of the board to make decisions in a fair manner, underpinned by independence, impartiality and integrity. Planning Commissioners and a Chief Planning Commissioner will replace the positions of Chairperson and Board Members. A new Governing Executive (led by a Chief Executive) will be responsible for the organisation’s governance and organisation.
- Additionally, the draft Bill proposes a review of the NPF be initiated and completed by 3<sup>rd</sup> April 2024.

- The Bill explicitly states that one of its core purposes is to “integrate the pursuit of the national climate objective with the plan-led development of the State”.

The government has indicated plans to move forward quickly with the Bill to see it enacted this year. It is understood there are concerns that the new legislation will introduce a period of uncertainty in the system for about two years as it is anticipated there will be legal challenges and testing of the new regime. This could impact developer confidence to initiate new projects during this period. It will likely be the end of 2025 before any legislative changes, or changes to the National Planning Framework, are reflected in local development plans.

Given the length of the draft Bill and ongoing pre-legislative scrutiny, detailed analysis of its ability to address the issues with the current planning system is not considered in detail in this discussion paper.

### 3. Planning and Energy Infrastructure

Most developments within energy infrastructure, including large and micro-scale generation in addition to transmission and distribution infrastructure, interact with the planning system to some degree. Meeting the carbon budgets, electricity’s sectoral emission ceiling and the national 2030 target all require accelerated development of renewable energy, and associated development of the electricity network.

In the wake of the Russian invasion of Ukraine, the European Commission introduced a temporary emergency regulation to accelerate the roll-out of renewable energy on 19<sup>th</sup> December 2022.<sup>[19]</sup> The regulation aims to ensure a faster permitting process for those high potential developments capable of quick deployment that also have the least impact on the environment. It includes provisions to simplify the roll out of and fast track connections to grids (within a 3-month timeline). Most importantly, it was agreed that “*the planning, construction and operation of plants and installations for the production of renewable energy is presumed to be in the overriding public interest.*”<sup>[2]</sup> Ireland submitted a statement requesting guidance on how this regulation interacts with environmental legislation such as the EU Habitats Directive as it may “*lead to legal challenge and uncertainty, which would have the undesired and contradictory effect of slowing down the delivery of essential renewable projects*”.<sup>[20]</sup>

As part of the REPowerEU plan the Commission adopted a targeted legislative proposal that amends RED II. The new proposal includes enhanced measures to accelerate permitting procedures for new RES power plants, or for adaptation of existing RES installations. Member States would be required to designate 'renewables go-to areas', which are particularly suitable areas for RES installations and would benefit from accelerated permitting procedures. The proposal would limit the grounds of legal objection to new RES installations by considering

that RES production, its connection to the grid, the grid itself and related storage assets would be presumed to be of overriding public interest for this specific purpose.

The lack of alignment with other EU Environmental Directives could present procedural and practical challenges for authorities in Ireland in designations of presumed IROPI (imperative reasons of overriding public interest) for the purposes of the Habitats Directive and the identification of ‘renewables go-to areas’ which are also sensitive to biodiversity and EU environmental legislation.

There are questions as to whether Ireland’s planning system is capable of delivering the extent of development required to allow 2030 targets to be met. Research by the ESRI indicates a cost to electricity consumers from delays in the planning system, with costs being 10% lower in a modelled system without delays, and carbon emissions being 3.4% lower without delays (Longoria et al, 2022).<sup>[29]</sup> With limited remaining time to meet 2030 targets, the ability of the system to process the required applications is under scrutiny.

The electricity sector faces a target of a 75% reduction in emissions from 2018 levels by 2030. The Climate Action Plan 2023 sets renewables targets of up to 9GW of onshore wind, 8GW of solar and 7GW of offshore wind by 2030. At the end of 2022, there was approximately 4.53GW of installed (energised) onshore wind capacity in the Republic of Ireland and about 25MW of offshore wind and 34 MW of solar (see table 1). Development of solar is increasing with considerably more solar contracted for connection than currently connected.

*Table 1. Existing capacity 2022 (Source: Eirgrid, ESB Networks)*

	Connected/ Energised (MW)	Contracted (MW)
Distribution wind	2,293	474
TSO wind	2,235	1,450
<b>Total Wind</b>	<b>4,527</b>	<b>1,924</b>
Distribution solar	34	700
TSO solar		1,694
<b>Total Solar</b>	<b>167</b>	<b>2,393</b>
<b>Totals</b>	<b>4,694</b>	<b>4,317</b>

Planning permission is required before a developer can seek a contract for connection to the distribution or the transmission grid and it is required to be in place to continue operation. SEAI

has been tracking renewable energy planning applications and permissions from publicly available documents and shared their data with the Climate Change Advisory Council Secretariat. It is collated from official sources but due to the variable quality of the sources, difficulties are encountered in assembling comprehensive datasets.

A number of issues arise in respect of planning permission for wind and solar farms which we develop further in the subsections that follow;

1. The quantity of planning applications represents a challenge to the planning system.
2. The time limited consents that were offered to many of the currently operational wind farms could cause an issue before 2030.
3. The timeframe required for a planning application.
4. The capacity of a given area or county to increase renewable generation.

### 3.1 Administrative Capacity

Wind Energy Ireland (WEI), in a presentation to the Oireachtas Committee in 2022 said that *“Resources [are] urgently needed in An Bord Pleanála, NPWS and other agencies. The system is simply not able and not ready to process the volume of onshore and offshore planning applications. The new onshore wind energy guidelines need to be published to support the delivery of onshore wind energy targets”*. They also stated they *“need full political support for EirGrid’s strategy to reinforce the electricity grid.”* WEI notes 28GW in offshore wind and over 10GW in on shore wind is ‘in development’ and ‘competing’ for delivery by 2030. Figure 3 below illustrates the scale of the administrative task at this point in time for wind based on the number of Local Authority Planning Applications over time. Figure 4 presents this information for solar farms.

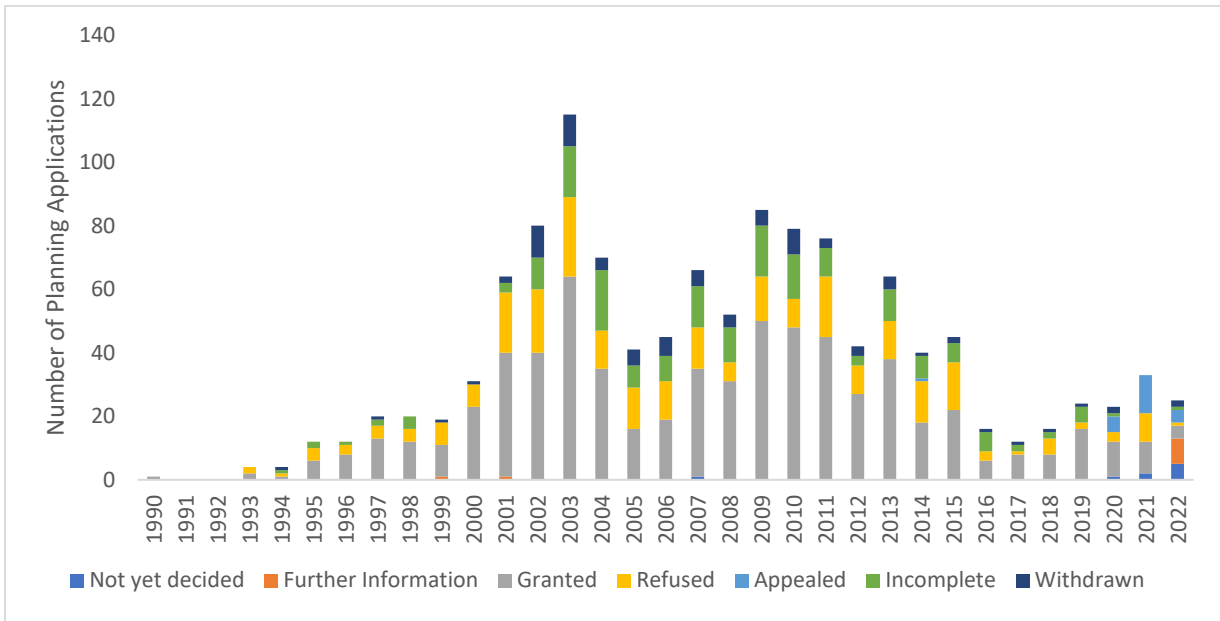


Figure 3. Number of wind farm planning applications and their status (Source: SEAI correspondence)

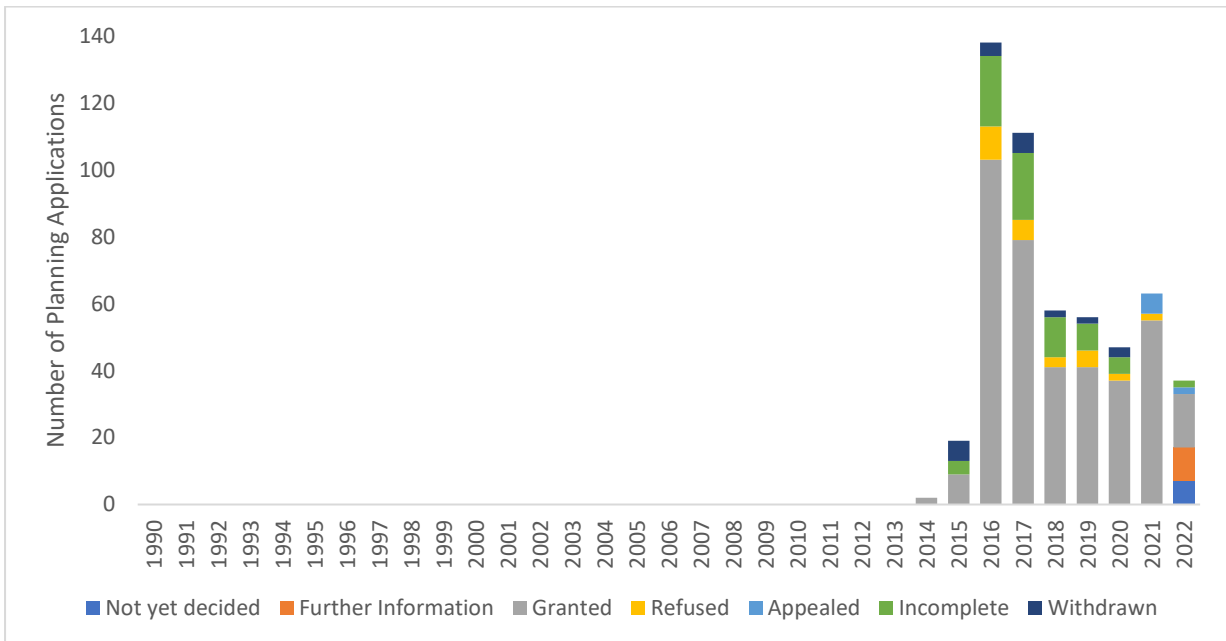


Figure 4. Number of solar farm planning applications and their status (Source: SEAI correspondence)

This level of activity needs to increase if Ireland is to meet its goals for 2030. If we consider that the applications are primarily directed towards a subset of local authorities, the challenges to capacity for processing planning decisions in those local authorities becomes more obvious. Figure 5 and 6 are illustrative of the concentration of the capacity issue in some counties.

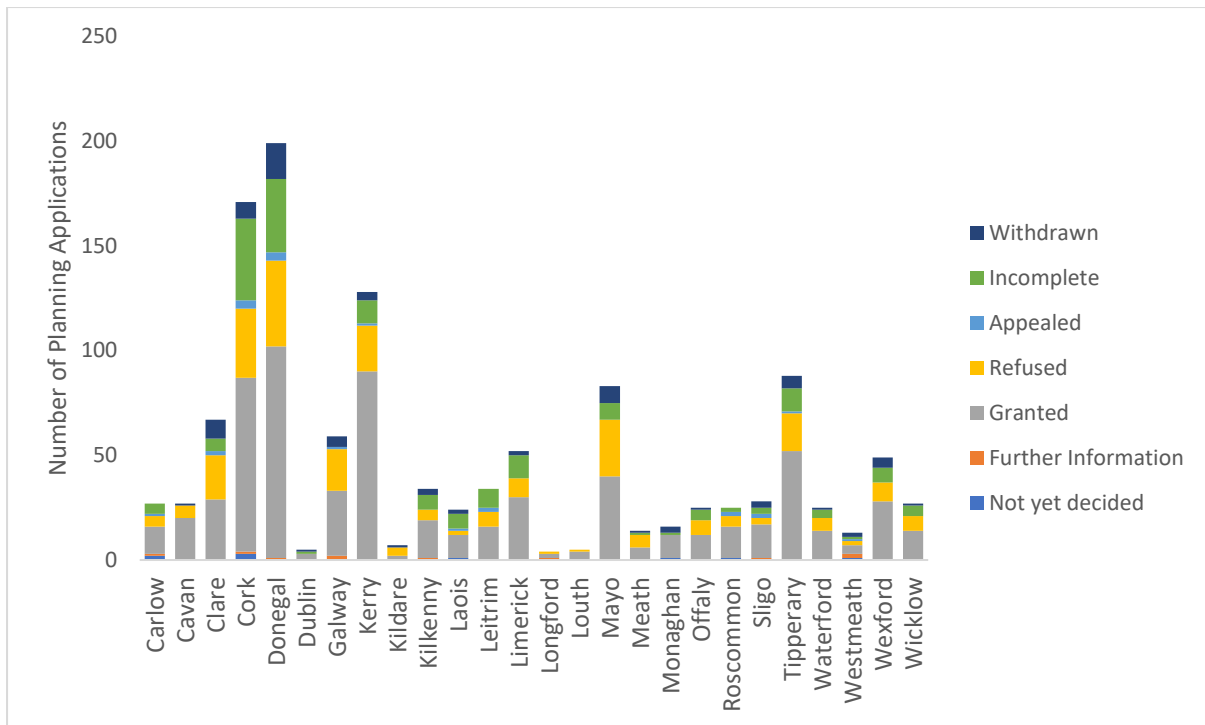


Figure 5. Wind Farm planning status by county 1990-2022 (source SEAI correspondence)

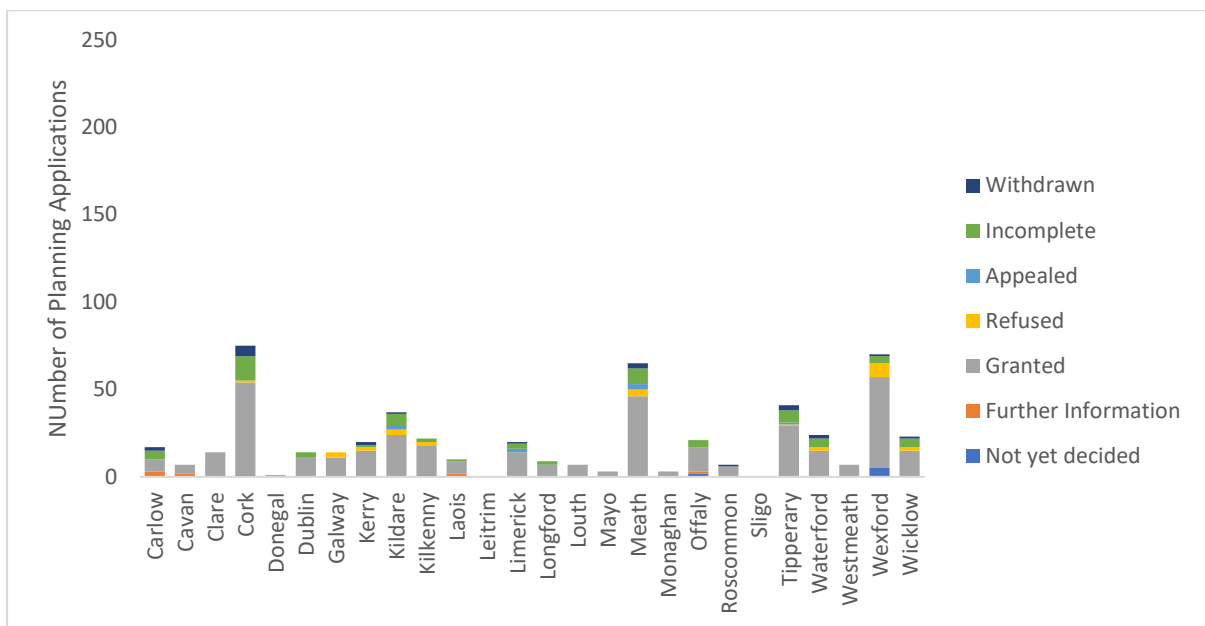


Figure 6. Solar Farm planning status by county 1990-2022 (source SEAI correspondence)

Solar applications are becoming more numerous than wind applications as they tend to be for smaller installations. The national target for solar power is 8GW by 2030. There are currently approximately 2GW contracted for connection at the Transmission and Distribution level. Siddharth and Deane (2022) estimated that putting 2.4 kW capacity of solar PV on one million suitable homes in Ireland would provide total capacity of 2.5GW. <sup>[44]</sup> Therefore, in order to meet 2030 targets for solar, it can be anticipated that at the very least 3.5 GW development of larger scale solar installations will be required. While planning exemptions for solar on buildings have



been extended to larger installations, it would still mean significant additional administrative burden in the planning system to meet 2030 targets.

Discussion with colleagues in SEAI highlighted the expert input required by local authorities to process renewable energy planning applications and their complexity compared to the more regular planning applications for buildings that local authority staff would be used to.

Creation of a standardised form for renewable energy applications and a greater role for SEAI in assisting Local Authorities in assessing applications could help reduce the administrative burden on both developers and Local Authorities.

### 3.2 Time Limited Consents

While planning permission for buildings is usually granted indefinitely, that is not the case for windfarm developments. Figure 7 illustrates the variety of time limits placed on windfarm planning consents in recent years. The CCAC Secretariat understands that no guidance has been given to Local Authorities regarding the duration of planning consents for windfarms. Existing planning conditions are typically for 20 – 25 years from commissioning, however, there is potential for 30-35 years operational life along with the potential for repowering of sites. Repowering projects involve replacing existing turbines with newer higher capacity models.

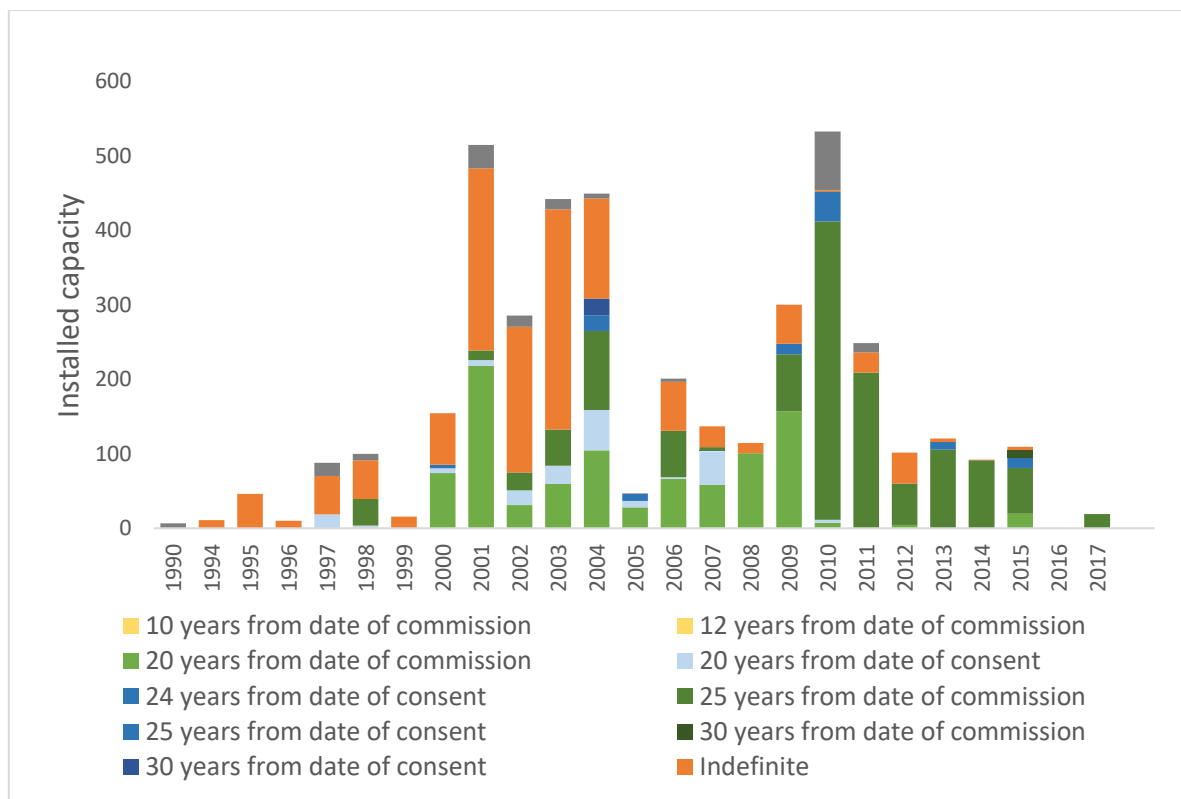


Figure 7. Planning Permission Duration in the year granted (Source: Correspondence with SEAI)

As it stands, when a time limited consent reaches its end, if a windfarm wished to maintain operation it would have to make a new application for planning permission or otherwise it would be required to cease operation, and presumably dismantle and remove equipment from the site. Figure 8 illustrates that many wind turbines will lose their planning consent before 2030. According to the data collected, approximately 287 turbines will lose their planning consent by 2030. This represents an additional challenge to meeting 2030 targets for renewable energy.

It should be noted that under REDII, Member States are required to facilitate the repowering of existing renewable energy plants by ensuring a simplified and swift permit-granting process. The length of that process shall not exceed one year. As part of the REPowerEU plan (18 May 2022) to phase out the EU's dependence on Russian energy imports and continue to support the EU transition to climate neutrality, the Commission adopted a targeted legislative proposal that amends RED II<sup>3</sup>. This aims to accelerate the permitting deadline from one year to three months for repowering projects that increase capacity by up to 15% and do not need grid reinforcements<sup>4</sup>. For larger repowering projects, the timeline has been shortened from one year to six months. Environmental impact assessments will be limited to the changes to the site, replacing previous requirements to follow similar processes to a brand-new facility.

Installing new wind turbines can significantly increase installed capacity, given the scale of the increase in turbine power ratings since older sites were energized. Most repowering projects will use fewer but taller turbines which should free up some additional space, but stricter setback distances based on tip height could also be a barrier for repowering sites.

It might be beneficial to consider whether there are ways to reduce the administrative burden that would be created such windfarms reapplied for consent for the existing structures or if windfarm developers chose to upgrade the turbines on their site.

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<sup>3</sup> [https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/698781/EPRS\\_BRI\(2021\)698781\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/698781/EPRS_BRI(2021)698781_EN.pdf)

<sup>4</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2022%3A222%3AFIN&qid=1653033811900>

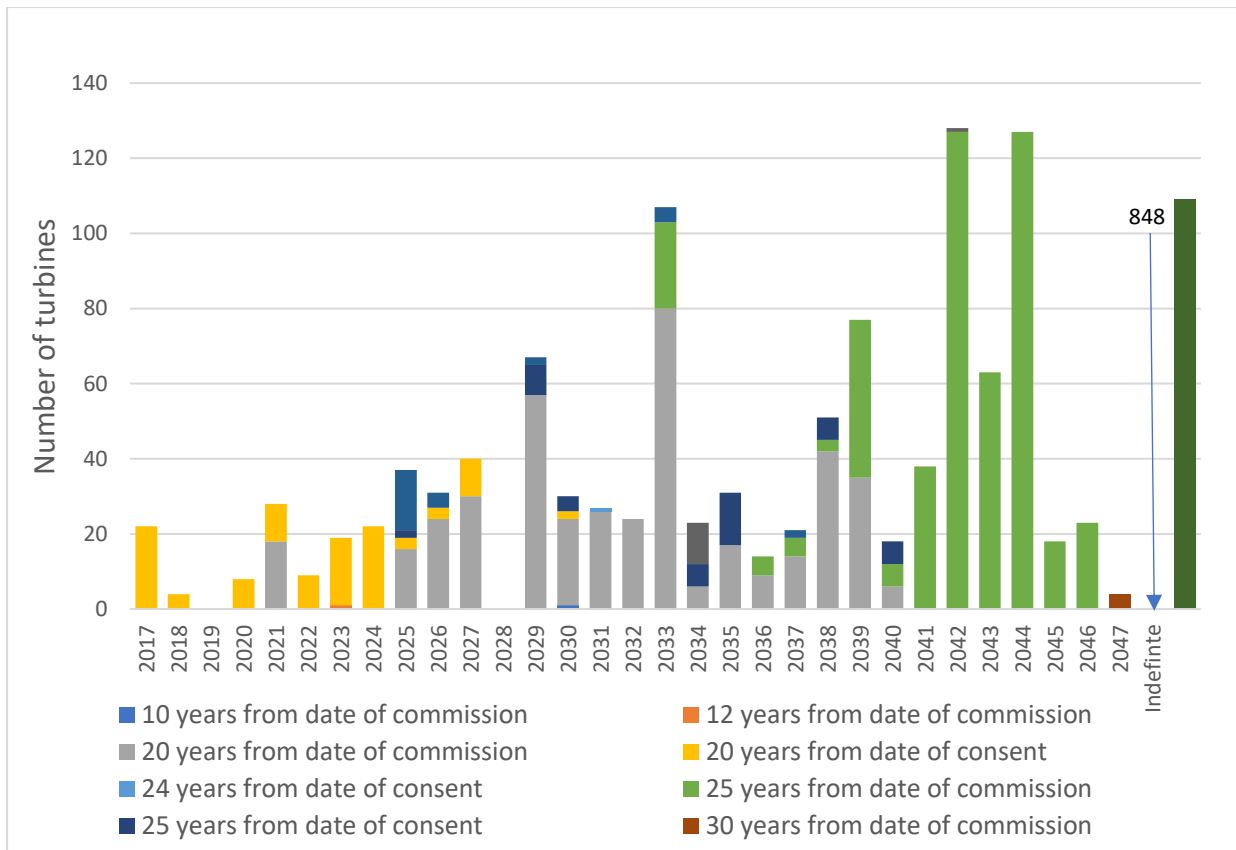


Figure 8. Planning Permission Duration (Source: SEAI correspondence)

### 3.3 Planning Decision Timelines

Wind Energy Ireland has noted that though the statutory timeframe to decide applications from wind energy projects in 18 weeks, the average time for a decision is over a year and some projects have waited more than two years for a decision. As planning permission is required before a grid connection agreement can be sought, and as there is generally a required cooling off period after planning has been granted before construction can begin, a considerable delay is created in bringing windfarm projects to energisation/operation. In order to achieve the scale of renewable energy deployment required for 2030, it may be necessary to consider not only shortening the decision time for the planning process but also perhaps allowing some of these processes to happen in parallel to a certain extent but also while avoiding spurious applications from burdening two bodies unnecessarily.

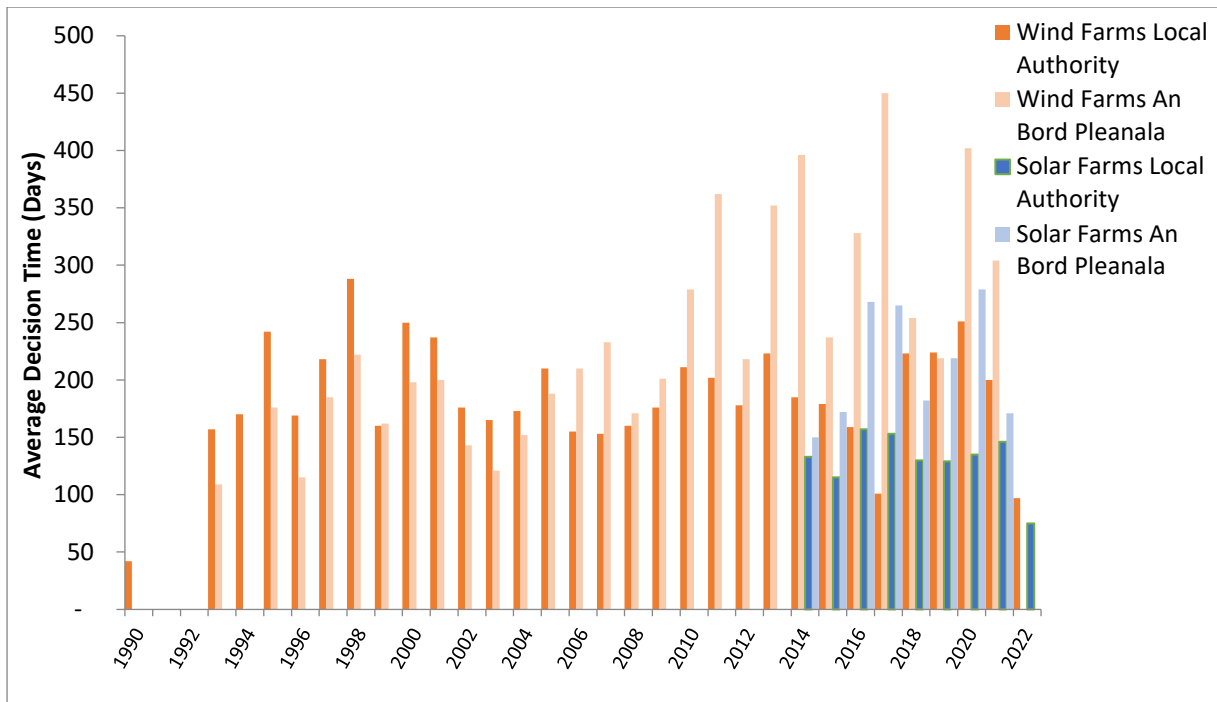


Figure 9. Average timeframe in days for granted and refused planning applications at Local Authorities and An Bord Pleanála (Source: SEAI correspondence)

A 2020 Wind Energy Ireland report on developing onshore wind farms noted that the typical time period for a wind energy project is between 8.5 years to 20+ years to go from initial site identification to producing renewable energy in the current policy/regulatory environment. [27] The report also highlighted the shortcomings of the current planning policy which cause delays and in turn undermine its alignment with climate policy and addressing future challenges. Those of note included the delays in the “pre-determination” stage caused by deliberations on whether a wind energy project is classed as a Strategic Infrastructure Development, and the frequency of refusal in this stage for reasons such as inappropriate site selection, a lack of policy to support the development or the expectation to follow new requirements or guidelines that had not been identified earlier.

Creation of a standardised form for renewable energy applications and a greater role for SEAI in assisting Local Authorities to assess applications could help reduce the time taken to process applications and reach a final decision. However, objections to applications for planning permissions would also seem to play a role in extending the decision time.

Moving from a developer-led to a plan-led approach to identify areas for renewable energy development offers an opportunity to improve public engagement approaches (McGookin, 2023). Well-structured deliberations may help to prevent tensions later down the line when projects go for planning permission.

### 3.4 Capacity for Renewable Energy Development

To reach targets, the capacity of onshore wind generation needs to effectively double from existing levels. This does not mean double the number of turbines, as technology is continuously improving and each individual new wind turbine can produce more electricity. Nevertheless, it will represent a large increase in the number of turbines in Ireland. Existing development has seen a concentration of windfarm development in some counties, reflecting the concentration of applications discussed earlier (see Figures 5 and 10).

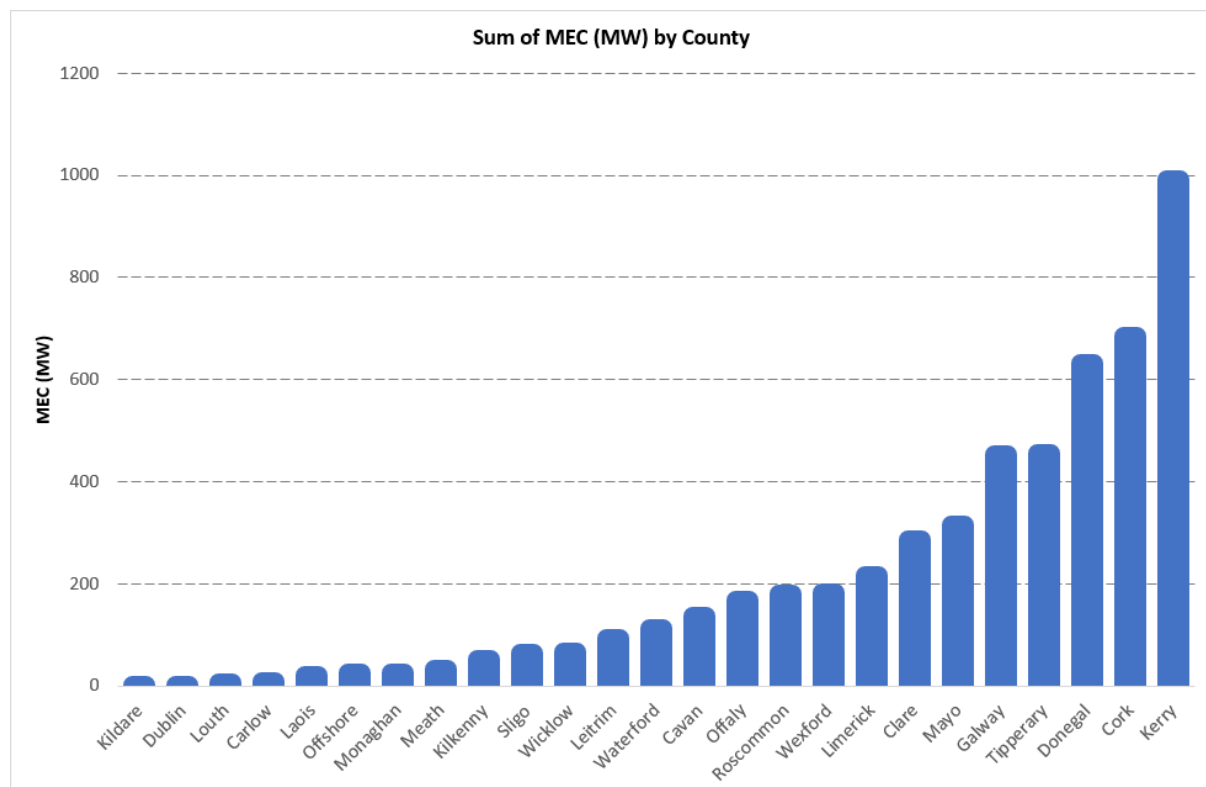


Figure 10. Installed capacity up to 2021 (Source: SEAI correspondence)

In terms of whether further development of Ireland’s wind energy resource will see a more even spread of capacity or if the concentration profile will be maintained, McGookin (2023) notes;

*The placement of energy infrastructure can cause significant local tensions. Research has highlighted that one of the factors sparking these tensions is a perception of exclusion from key decisions when public engagement is left to the planning application stage. In light of this, the Office of the Planning Regulator notes that “A national renewable energy roadmap with county-specific targets could provide the basis for designation of Sustainable Energy Zones by local authorities in their development plans”. The regulator proposes that a key benefit of this*

*national “spatially co-ordinated strategy” would be to help build “greater consensus on where and how to electrify our mobility, home heating and wider economic systems” (Cussen, 2021).*

It could also be noted that such an approach would offer certainty versus a developer led approach which can lead to questions of ‘Where does it all end?’ or ‘is everyone else doing their bit?’. McGookin further notes that *“moving from a developer-led to a plan-led approach to identify areas for renewable energy development offers a great opportunity to improve public engagement approaches.”*

The Climate Action Plan 2023 includes an action to *“Set out the onshore wind energy and grid-scale solar national and regional targets in the Renewable Electricity Spatial Policy Framework and publish a revised Methodology for Local Authority Renewable Energy Strategies”*. It also says, *“Following publication of a Regional Roadmap, Regional Assemblies will publish and implement Regional Renewable Electricity Strategies, enabling a unified methodology for national and regional spatial and capacity targets, identifying areas suitable for renewable electricity deployment at regional and county level.”* It is intended that this is subsequently reflected in county development plans.

## 4. Planning and Spatial Development

This section will address issues regarding the location of residential, retail and industrial development and how this impacts Ireland’s climate goals. The placement of residential, retail and industrial development in relation to each other and existing settlements impacts both demand for transport and the efficiency with which services such as public transport, water supply, waste and recycling facilities etc. can be supplied.

As discussed in Section 2.1, the National Planning Framework sets a target for the four cities of Cork, Limerick, Galway and Waterford to each grow by at least 50% by 2040, enabling those cities to be regional drivers of growth. A compact growth target was also set, targeting 40% of future housing development to be within and close to the existing footprint of built-up areas. This section will consider the National Planning Framework, its implementation and barriers facing sustainable spatial development.

### 4.1 The National Planning Framework

The NPF, published in 2018, was designed around the expectation that Ireland’s population would grow by one million over the following 20 years. Population growth has been in the upper band of population projections published by the CSO in 2018. The population of Dublin in 2022, at 1.451 million exceeds the CSO’s lower bound estimate for Dublin’s population in 2036. The recent population statistics have led some to suggest that a revision of the NPF

and population projections are required. The draft Planning and Development Bill (2023) would require a review of the NPF to be completed by April 2024. This is in line with previous plans but is perhaps gaining more significance now.

A review of the NPF needs to ensure that its policies and targets take into account updated understandings of population and economic growth and their regional distribution. A review of ambition for sustainable spatial development could also be warranted. The OECD noted that the compact growth target in the NPF was insufficiently ambitious to achieve low carbon transition in the transport sector; that it “*still allows for 60% of urban development and 70% of rural development to take place in greenfield areas, thus enabling urban sprawl to continue*”.<sup>[36]</sup> They note that urban sprawl brings with it “*higher infrastructure costs and emissions*”. Urban sprawl makes the low carbon transition more expensive by increasing the cost (reducing the viability) of low carbon services such as public transport, active travel infrastructure and district heating.

A review of the NPF should also focus on stronger quantification of the imperatives around compact and sustainable urban development from a climate & emissions perspective by harnessing for example NTA transport modelling and/or ESPON derived research<sup>5</sup> to quantify the influence of spatial planning policies on greenhouse gas (GHG) emissions in a consistent manner.

Although the provision and continuation of rural housing, inclusive of one-off homes, is assured within the NPF, from a planning perspective there is a requirement for clear distinction between areas within the commuter catchment of cities and large towns and centres of employment, and areas outside the catchment. Essentially, the need for one-off houses should be based on projections of quantified demand at Local Authority level using the Housing Need Demand Assessment (HNDA) tool<sup>[24]</sup> and county development plan core strategy processes.

## 4.2 Implementation

While the NPF has been criticised as being out of date or insufficiently ambitious, a further key concern is the extent to which the NPF has been reflected in actual planning decisions. Indicators to assess progress in compact living goals have only recently become available due to previous issues with the definition of settlements in the CSO data. The Regional Development Monitor (RDM) was developed for the regional assemblies to provide data on a range of topics to assess implementation of the RSES.<sup>[42]</sup> Further indicators on compact

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<sup>55</sup> <https://www.espon.eu/sites/default/files/attachments/QGasSP%20final%20report.pdf>

growth are in development by the Department of Housing, Local Government and Heritage (DHLGH).

Figure 11 illustrates the performance of different counties against the compact growth target of 40%, as assessed by the RDM, with recent figures from the CSO providing information on the scale of population growth in each county from the 2016 census to the 2022 census. The compact growth rate assesses the percentage of development that occurred within built up areas, with boundaries as defined in the 2016 census. The data shows that some counties have performed very well against the target, but other counties are not meeting the target.

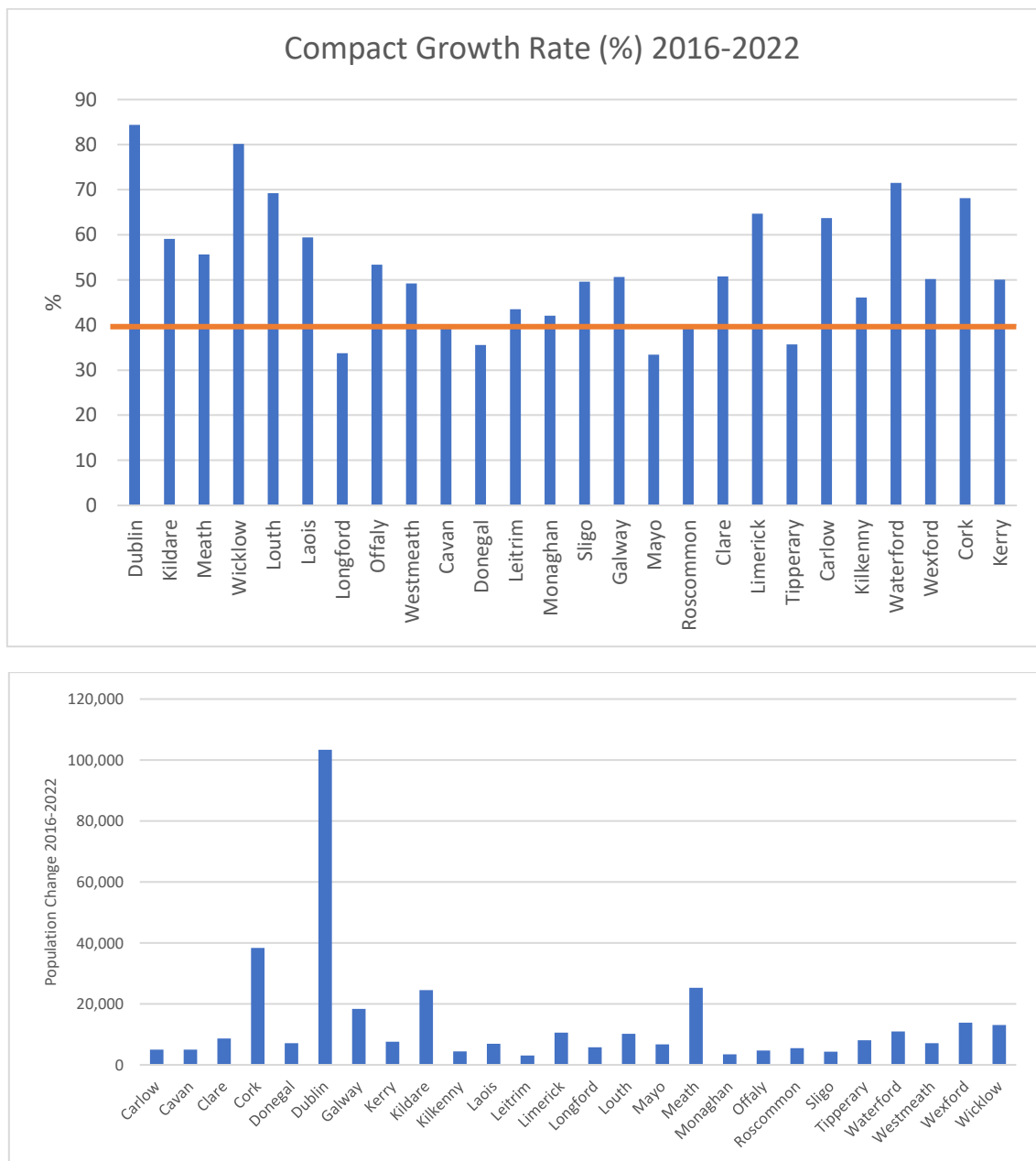


Figure 11. Compact Growth and Population Change (Source: CSO 2023, RDM 2023)



Figure 12 illustrates that a falloff in permissions granted for multi-unit developments has not been replicated for one off houses. While permissions for apartments were increasing steadily up to 2021, it does not seem from the data like this will continue. Possible reasons for this are discussed in section 4.3 below. This data cannot tell us if the multi-unit or apartment developments are appropriately located or of an appropriate density.<sup>6</sup>

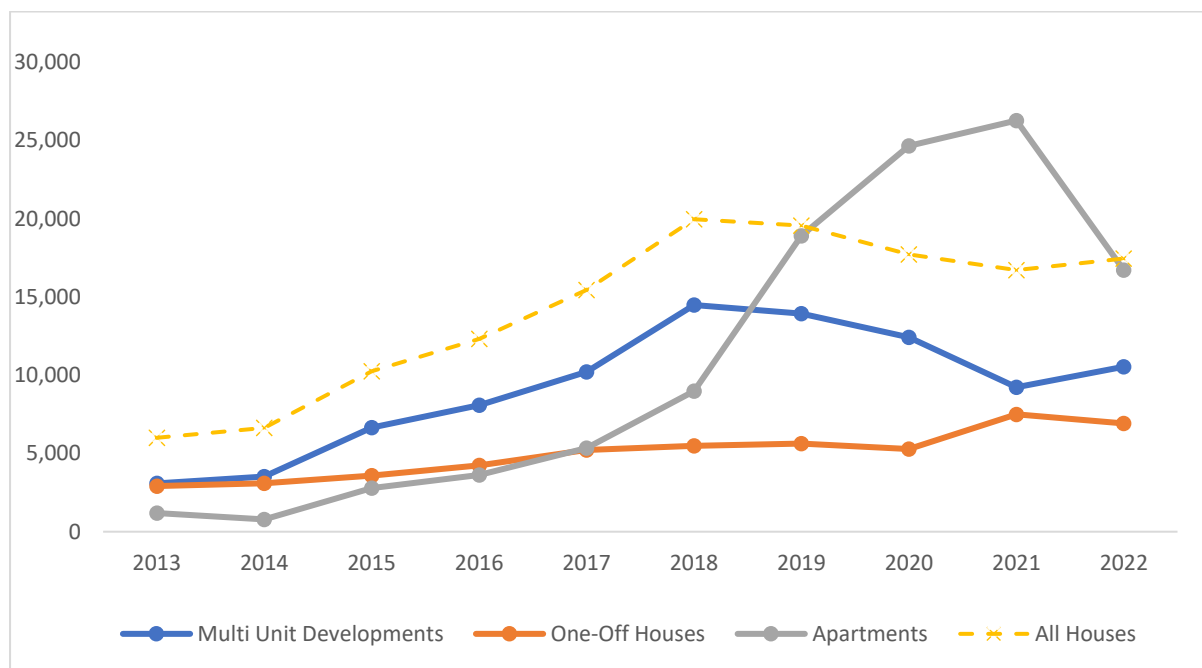


Figure 12. Units granted planning permission by year and type (Source: CSO 2023).

### 4.3 Barriers to Sustainable Spatial Development

Sustainable spatial development reduces transport demand and also reduces the cost of provision of low carbon services such as public transport and district heating. Low density development by contrast is usually not sustainable, particularly where it is connected to distant economic centres, because it increases the costs of provision of low carbon services such as public transport and district heating. It makes active travel less viable, and it fosters car dependency. Low density development is usually associated with greenfield development. Brownfield or infill development is normally associated with higher density. The OECD (2022) noted that “housing development trends in Ireland show a clear dominance of greenfield development, in the form of detached and one-off housing in the outskirts and countryside around cities and towns”. While some narratives present this as evidence of a preference for rural living, evidence suggests other forces at work.

<sup>6</sup> Planning data published by the CSO is only available at the level of Local Authority whereas the New Dwelling Completions dataset offers more granular geographical breakdowns

Research by the website company Daft.ie using its own data demonstrates a premium for living in cities versus other locations, and commuter counties having higher house prices than those counties further away from a city.<sup>[31]</sup> Previous research by Daft in 2016 demonstrated a premium being paid for houses close to urban and light rail services in most cases.<sup>[30]</sup> This undermines the argument that urban sprawl or long-distance commuting happens because people/families want to live in the countryside. Where appropriate housing exists in urban areas it is in high demand. Thus, it suggests that the current system creates a tension between sustainable housing provision and affordable housing provision. Given the need for accelerated delivery of affordable housing, resolving or eliminating this tension is key to achieving our housing and climate goals at a reasonable cost.

#### *4.3.1 Incentives for greenfield development*

The OECD Transport report noted the greater cost to developing brownfield versus greenfield sites as a contributing factor in urban sprawl. In a presentation to the DCC Housing Committee in 2020, the RIAI noted that “it is much cheaper to **deliver** houses in green fields than any kind of infill development. ... While delivery costs are higher, **all other** costs associated with infill development are lower” [emphases copied from source material].<sup>[43]</sup> Greenfield development is cheaper because of lower land prices away from urban areas and due to greater technical or logistical challenges that can arise from building in urban areas. The OECD note research from the SCSJ that finds that the profit margin on suburban development (in 2021) was 16 – 21% whereas for urban development it was 11 – 13%. Some greenfield development originates in the purchase of land at agricultural prices, leading to still lower costs for the developer once zoning and/or planning permission is achieved. The OECD suggests that the best way to tackle urban sprawl is to reduce the comparative costs of brownfield or infill development. They note that without addressing this issue, setting a more ambitious target for compact growth is unfeasible. Addressing the poor economic incentives for urban brownfield/infill development could legitimately be framed as a climate imperative, as well as supporting affordable housing policy.

The National Economic and Social Council has made a number of recommendations regarding economic instruments to support sustainable housing development under its work programme “Land Use, Land Value and Urban Development”.<sup>[35]</sup> Efforts are underway to address the incentives for greenfield development, and the non-development of urban land. A Residential Zoned Land Tax was introduced in Budget 2022 for implementation from 2024. It will apply to land that is zoned for residential use on or after January 1<sup>st</sup>, 2022, and that is also serviced. It will not apply to residential properties where the Local Property Tax applies.<sup>7</sup> It is

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<sup>7</sup> Some other exemptions apply.

calculated and paid annually at 3% of the market value of land within its scope and is collected centrally by the Revenue Commissioners. The aim of this tax is to increase housing supply by activating zoned and serviced residential development lands (including mixed-use lands) for housing; i.e. to encourage land that is zoned to be developed sooner. It also aims to incentivise landowners to use existing planning permissions for housing.

In December 2022, the cabinet agreed an updated “General Scheme of the Land Value Sharing and Urban Development Zones” Bill. The Government published an earlier draft of this document in 2021.<sup>[14]</sup> According to the 2021 draft, it would provide, *inter alia*, for the local authorities to secure a proportion to the increase in land values arising from public decisions and investment related to planning and development on land that is newly zoned for housing, and for the designation of Urban Development Zones for significant development of housing and other purposes. The land value sharing would apply to the difference between the current/previous use-value of the land and the value of the land after the change, e.g. it could be the difference between the agricultural land value of a site and then its value as a zoned residential site. The money would accrue to the local authority for expenditure on public infrastructure and facilities. The bill suggests the proportion due to the local authority would be up to 30% of the total increase in site value. This measure, and provisions under the designation of urban development zones should both support a closing of the gap in the costs of developing brownfield/infill development sites versus greenfield and improved provision of services for residential areas that should support the low carbon transition. Therefore, in the context of ongoing efforts to deliver more housing rapidly, the progress of this bill is crucial for the low carbon transition.

#### *4.3.2 Greenfield development*

While criticising the lack of ambition in the compact living targets and offering advice on increasing development of brownfield and infill sites, the OECD also notes the necessity to strategically plan greenfield development when it is anticipated to be necessary for housing goals. They point to negative impacts of policies that aim to contain greenfield development, without directing it such as housing shortages, affordability issues, or leapfrog development in the case of green belts. Strategic greenfield development would support new communities with high accessibility, access to sustainable modes of transport. This has been achieved in some locations in Ireland (e.g. Pelletstown and other stops on the Maynooth rail line) but it should be the norm. Moreover, strategic greenfield development should include plans for zero carbon district heating.

### 4.3.3 Building standards and achieving appropriate densities

The OECD report noted that building regulations might represent a barrier to compact living developments.

Developers must comply with the regulations and standards set within the Local Authority Development Plan of the area where they intend to build. Each Local Authority (LA) uses the national guidance, which has been developed under the Planning Act, to inform their standards within their Development Plans. The national mandatory objectives, minimum requirements and recommendations for civic and amenity space such as green space, car parking and children's play areas are outlined in the following policy documents used by the LAs:

- *Development Plans Guidelines for Planning Authorities (2022)* <sup>[16]</sup>
- *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) (2009)* <sup>[7]</sup>
- *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (DSFNA), 2018 (updated in 2020)* <sup>[46]</sup>

These high-level guidelines allow for a degree of flexibility as defined restrictions are avoided where possible in order to achieve growth towards sustainable compact living. However, any specific minimum standards must be incorporated. For example, with apartment development, there are set minimum standards for both private and communal apartment amenity space as seen below.

Minimum floor areas for private amenity space	
Studio	4 sq m
One bedroom	5 sq m
Two bedrooms (3 person)	6 sq m
Two bedrooms (4 person)	7 sq m
Three bedrooms	9 sq m

Minimum floor areas for communal amenity space	
Studio	4 sq m
One bedrooms	5 sq m
Two bedrooms (3 person)	6 sq m
Two bedrooms (4 person)	7 sq m
Three bedrooms	9 sq m

Figure 13. Apartment Minimum Amenity Space (Source: Standards within the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (DSFNA), 2018)

In addition, there is a minimum 10% requirement for public open spaces for all residential schemes noted within the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) (2009). Although these standards

require a certain amount of space, choosing the option such as rooftop garden as communal space can have a positive impact on compact development goals. Furthermore, it is possible for developers to financially contribute to the provision of public open spaces elsewhere in the vicinity if factors such as site constraints are impacting or if a public park is already existing in the locality. This concession is essential for development of infill sites however, it raises costs for the developer.

There are also guidelines for car parking spaces for apartments. For central/accessible urban locations “the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances” (DHLGH, 2018). For suburban/urban areas “reduced car parking must be considered but an appropriate maximum car parking standard must be applied” (DHLGH, 2018). For apartments “in relatively peripheral or less accessible urban locations, one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required” (DHLGH, 2018). According to the OECD (2022), providing for car parking including EV charging space reinforces the concept that everyone has a right to a private car and a designated space. It states that “a development that needs a certain amount of car parking (now potentially with charging infrastructure) is more space-intensive and expensive, which means that more space needs to be used to deliver more housing, and housing in the outskirts (where land is cheaper) is further incentivised” (OECD, 2022).

Recently published analysis suggested due to changes in costs, affordable apartment development may no longer be possible. Analysis published by Mitchell McDermott (2023) suggests that the total cost of delivering an apartment is in the region of €460,000.<sup>[1]</sup> This is unfortunate, however, apartment development is not the only way to achieve appropriate density development. Medium density housing, ‘walk-up’ apartments<sup>8</sup> and living ‘over the shop’ are alternative solutions to standard apartments in achieving compact living as identified by the Housing Committee of the Royal Institute of the Architects of Ireland (RIAI). Although there are examples of medium density housing in Dublin e.g. on older streets of terraced housing such as Portobello, they would not currently comply with Dublin City Council’s Private Open Space standards <sup>[3]</sup> or separation distances <sup>[4]</sup>. It is clear from these past developments that terraced houses without front gardens and with modest rear gardens can achieve medium densities. Similar to concessions which are available to developers in lieu of providing for open amenity space as mentioned previously, there is a need for appropriate consideration for the

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<sup>8</sup> ‘Walk up apartments’ are those where you ‘walk up’ a stairs to your front door.

same type of concession to be made in this regard for terraced housing without front gardens particularly in well serviced areas where a car parking space is not needed.<sup>9</sup>

Moreover, walk-up apartments, which are a standard solution in the UK and Europe, also do not comply with Dublin City Council or Irish Building Regulation Standards.<sup>[43]</sup> Living 'over the shop' has been described as "not currently viable" but its potential to provide housing in much needed urban locations is undeniable (RIAI, 2022). Incentives for this type of conversion alongside existing retrofitting plans have been suggested by the RIAI.

In 2020, the RIAI noted that by their estimate, a medium density development (5-6 storey apartments with excellent public realm) attracts 5 times more tax than if the site was developed for houses.<sup>[43]</sup> This issue would also need to be examined in order to ensure that appropriate density development is encouraged.

It is essential to emphasise that compact growth does not mean smaller units or high-rise buildings but rather building within existing cities and towns on brown/infill sites. It also does not mean building on public green space. Compact growth can only work where regulations permit it and where an excellent urban realm and provision of services are readily accessible.

Overall, there is a need for a much more extensive state-policy and financial instrument led approach to securing a much greater output of future housing output of both existing building stock and bona-fide brownfield development land (utilising the definition of same in the 2023 Planning Bill). For example, measures such as Project Tosaigh<sup>10</sup> and Croí Cónaithe<sup>11</sup> could offer the basis for much more ambitious delivery of sustainably located housing in and around city and town cores countering present economic advantages of greenfield development, which do not consider climate impacts.

## 5. Summary and Potential Recommendations

A number of provisional recommendations have been developed based on research considered in this document. For reference, previous Council positions in this area are included in the Annex.

- Given the limited time remaining to meet the carbon budgets and the 2030 goals, an efficient and effective planning system that supports the low carbon transition is crucial.
- Generally resourcing of the planning system at local authority level, an Bord Pleanála, National Parks and Wildlife Services, and in the High Court has been identified as a

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<sup>9</sup> With the understanding that urban areas should be well serviced areas.

<sup>10</sup> See: <https://lda.ie/news/lda-to-accelerate-delivery-of-new-affordable-homes>

<sup>11</sup> See: <https://www.gov.ie/en/publication/c2183-croi-conaithe-towns-fund/>

constraint on efficient and effective operation of the system. Unfortunately, there may be a shortage of appropriately qualified professionals in this area. Increasing capacity and resource in this area is crucial to cope with the increased activity required to meet climate targets.

## **Renewable Energy**

Onshore Wind Energy Guidelines have been delayed for approximately 6 years but are urgently required as the previous guidelines were published in 2006 and are no longer fit for purpose in the scale of the current energy transition.<sup>[11]</sup> The new onshore wind energy guidelines need to be published to support the delivery of onshore wind energy targets. The recently announced further review of proposals to amend provisions of the 2006 Wind Energy Guidelines coupled to the ongoing timeline to deliver a regional roadmap for application of national renewable targets at individual local authority level means will lead to further delays in expanding a proven onshore renewables capacity. Early adoption of a simpler rules-based evaluation based on parameters such as turbine height would avoid potential litigation arising out of a more complex noise- based assessment.

The Renewable Electricity Spatial Policy Framework will be crucial to support scaled up deployment of renewable energy across the country. It needs to be published on time and to match the ambition of national goals. Well-structured deliberations and effective public consultation may help to prevent tensions later down the line when projects go for planning permission. Local authority development plans at present do not set a very clear framework for delivery of renewable projects in appropriate locations in order to meet national renewable energy targets (consistent with Action 102 of the CAP).

There are a number of recommendations for areas to consider practical fixes to increase capacity in the system to cope with increased activity towards 2030 goals;

- Given that the vast majority of development plans are not due for review until in or around 2028, action should be taken in the interim to ensure that development plans are varied in 2023/2024 to provide for a plan-led approach to renewables consistent with national targets. There are a number of mechanisms to achieve this, including the proposed provisions for National Planning Statements and expedited amendments of development plans under the Planning and Development draft Bill 2023 and the synchronisation between the approaching local authority climate action plans and existing development plans. It is crucial that these planning policy gaps at local level are addressed quickly to give greater local policy support for the advancement of the onshore renewable energy projects Ireland needs to meet its binding targets.

- Creation of a standardised form for renewable energy applications and a greater role for SEAI in assisting Local Authorities in assessing applications could help reduce the administrative burden and speed up decision making.
  - This could also facilitate easier data collection and tracking of progress in the development of sufficient pipeline of projects to meet carbon budgets and 2030 goals.
- It may be necessary to consider allowing some of processes (such as applications for planning permission, and applications for grid connection) to happen in parallel to a certain extent but also avoiding spurious applications from burdening two bodies unnecessarily.
- It may be useful for guidance to be given to Local Authorities regarding the duration of planning consents granted for renewable energy developments.
- There should be ways to reduce the administrative burden for existing renewable energy installations seeking an extension of their planning consent or seeking to repower/upgrade their renewable energy technology on-site.

Though it has not been a focus of this paper, support for EirGrid's strategy to reinforce the electricity grid remains a key requirement to increase the share of renewable energy on Ireland's electricity grids.

### **Spatial Planning**

The current system (encompassing market forces, preferences, legislation and institutions) creates a tension between sustainable housing provision and affordable housing provision. Given the need for accelerated delivery of affordable housing, resolving or eliminating this tension is key to achieving our housing and climate goals at a reasonable cost.

A review of the NPF needs to ensure that its policies and targets take into account updated understandings of population and economic growth and their regional distribution. The compact growth target in the NPF should be reviewed to support the low carbon transition while also supporting affordable housing and quality of life. More effort is required to ensure that the existing compact growth target is met across all counties, particularly in the catchment area of cities. Further development of useful indicators on sustainable spatial development and compact growth will be important to monitor progress.

Addressing the poor economic incentives for urban brownfield/infill development can legitimately be framed as a climate imperative, as well as supporting affordable housing policy.



In the context of ongoing efforts to deliver more housing rapidly, the progression of the Land Value Sharing and Urban Development Zones bill is crucial for the low carbon transition.

A more strategic approach is required to greenfield development where it is anticipated to be required to meeting housing demands that cannot be met by brownfield/infill development. Strategic greenfield development would support new communities with high accessibility, access to sustainable modes of transport. This has been achieved in some locations in Ireland (e.g. Pelletstown and other stops on the Maynooth rail line) but it should be the norm. Moreover, strategic greenfield development should include plans for zero carbon district heating.

New Rural Housing Guidelines, and Sustainable and Compact Settlement Guidelines, expected imminently should be ambitious in their support for affordable and low carbon housing provision.

## References

- [1] CNI, 2023. *Mitchell McDermott Annual Construction Sector Report 2023*. Available at: <https://www.constructionnetworkireland.com/mitchell-mcdermott-annual-construction-sector-report-2023/>
- [2] European Commission, 2022. *EU to speed up permitting process for renewable energy projects*. Available at: [EU to speed up permitting process for renewable energy projects - Consilium \(europa.eu\)](https://consilium.europa.eu/en/press/press-releases/2022/02/22-02-2022/)
- [3] DCC, 2022. *16.3.4 Public Open Space – All Development*. Dublin. Available at: <https://www.dublincity.ie/dublin-city-development-plan-2016-2022/16-development-standards/163-landscaping/1634-public-open-space-all-development>
- [4] DCC, 2022. *15.11 - House Developments*. Dublin. Available at: [15.11 - House Developments | Dublin City Council](https://www.dublincity.ie/15-11-house-developments)
- [5] DECLG, 2013. *Local Area Plans - Guidelines for Planning Authorities*. Ireland. Available at: [8e2cdc90-19b9-4f3b-9f51-21526983670d.pdf \(www.gov.ie\)](https://www.gov.ie/media/department_of_environmental_conservation/8e2cdc90-19b9-4f3b-9f51-21526983670d.pdf)
- [6] DHLGH, 2018. *Sustainable Urban Housing: Design Standards for New Apartment*. Ireland. Available at: [87a1ac92-9290-49d2-a913-a66865d95859.pdf \(www.gov.ie\)](https://www.gov.ie/media/department_of_environmental_conservation/87a1ac92-9290-49d2-a913-a66865d95859.pdf)
- [7] DHLGH, 2009. *Sustainable Residential Developments in Urban Areas-Guidelines for Planning Authorities*. Dublin.
- [8] DHLGH, 2004. *Strategic Environmental Assessment (SEA) Guidelines (2004)*. Available at: [1f5b38b3-e7db-45e3-98ee-a4adad35e4a4.pdf \(www.gov.ie\)](https://www.gov.ie/media/department_of_environmental_conservation/1f5b38b3-e7db-45e3-98ee-a4adad35e4a4.pdf)
- [9] DHLGH, 2005. *Sustainable Rural Housing - Guidelines for Planning Authorities*. Ireland. Available at: [Planning Guidelines.qxd - d5cacfab-e1ba-43be-b3d2-f0f539a4e87e.pdf \(www.gov.ie\)](https://www.gov.ie/media/department_of_environmental_conservation/Planning_Guidelines.qxd_-_d5cacfab-e1ba-43be-b3d2-f0f539a4e87e.pdf)
- [10] DHLGH, 2005. *Sustainable Rural Housing Development Guidelines*. Ireland: Available at: <https://www.thejournal.ie/guidelines-one-off-homes-rural-ireland-public-consultation-5923948-Nov2022/>
- [11] DHLGH, 2006. *Wind Energy Development Guidelines*. Ireland. Available at: [untitled - 93cd5b8e-e0d5-4369-8d41-45b9738a7b4d.pdf \(www.gov.ie\)](https://www.gov.ie/media/department_of_environmental_conservation/untitled_-_93cd5b8e-e0d5-4369-8d41-45b9738a7b4d.pdf)
- DHLGH, 2020. *Design Standards for New Apartments (DSFNA)*. Ireland.

- [12] DHLGH, 2009. *Sustainable Residential Developments in Urban Areas-Guidelines for Planning Authorities*. Ireland. Available at: [bf943e60-30d5-4ac3-8c7a-dc4f68b3d688.pdf](https://www.gov.ie/en/publication/bf943e60-30d5-4ac3-8c7a-dc4f68b3d688.pdf) ([www.gov.ie](http://www.gov.ie))
- [13] DHLGH, 2019. *Design Manual for Urban Roads and Streets – 2019*. Available at: [bfd64bd6-bde7-4fc7-946e-626d486202ba.pdf](https://www.gov.ie/en/publication/bfd64bd6-bde7-4fc7-946e-626d486202ba.pdf) ([www.gov.ie](http://www.gov.ie))
- [14] DHLGH, 2021. *General Scheme Land Value Sharing and Urban Development Zones Bill 2021*. Ireland. Available at: <https://www.gov.ie/en/publication/3cb33-general-scheme-land-value-sharing-and-urban-development-zones-bill-2021/>
- [15] DHLGH, 2022. *Collection Planning Guidelines/Standards*. Available at: [gov.ie - Planning Guidelines/Standards](http://www.gov.ie/en/publication/3cb33-general-scheme-land-value-sharing-and-urban-development-zones-bill-2021/) ([www.gov.ie](http://www.gov.ie))
- [16] DHLGH, 2022. *Development Plans - Guidelines for Planning Authorities*. Ireland. Available at: [gov.ie - Development Plans - Guidelines for Planning Authorities](http://www.gov.ie/en/publication/3cb33-general-scheme-land-value-sharing-and-urban-development-zones-bill-2021/) ([www.gov.ie](http://www.gov.ie))
- [17] DHLGH, 2022. *Draft Planning and Development Bill 2022*. Ireland. Available at: [gov.ie - Draft Planning and Development Bill 2022](http://www.gov.ie/en/publication/3cb33-general-scheme-land-value-sharing-and-urban-development-zones-bill-2021/) ([www.gov.ie](http://www.gov.ie))
- [18] DHLGH, 2022. *Greater clarity, consistency and certainty in planning to be delivered with new legislation*. Ireland. Available at: [gov.ie - Greater clarity, consistency and certainty in planning to be delivered with new legislation](http://www.gov.ie/en/publication/3cb33-general-scheme-land-value-sharing-and-urban-development-zones-bill-2021/) ([www.gov.ie](http://www.gov.ie))
- [19] European Commission, 2022. *Laying down a framework to accelerate the deployment of renewable energy*. Available at: [EUR-Lex - 32022R2577 - EN - EUR-Lex](https://eur-lex.europa.eu/eli/reg/2022/2577/oj) ([europa.eu](http://europa.eu))
- [20] European Commission, 2022. *Communication - Statement by Ireland*. Available at: [cm05902-en22.pdf](https://eur-lex.europa.eu/eli/reg/2022/2577/oj) ([europa.eu](http://europa.eu))
- [21] Fox, H., 2022. *Ready, Set, Go: Europe's race for wind and solar*. Ember. [Ready, Set, Go: Europe's race for wind and solar | Ember](https://ember-climate.org/) ([ember-climate.org](https://ember-climate.org/))
- [22] DHLGH, 2018. *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment*. Ireland. Available at: [34aa9919f24243b79454994bc06476e1.pdf](https://www.gov.ie/en/publication/34aa9919f24243b79454994bc06476e1.pdf) ([www.gov.ie](http://www.gov.ie))
- [23] House of the Oireachtas, 2023. *Dáil Eireann Debate – Housing Policy*. Available at: [Housing Policy – Tuesday, 24 Jan 2023 – Parliamentary Questions \(33rd Dáil\) – Houses of the Oireachtas](https://www.oireachtas.ie/en/debates/2023/01/24/housing-policy/)

- [24] House of the Oireachtas, 2023. *Parliamentary Question*. Available at: [Housing Policy – Wednesday, 18 Jan 2023 – Parliamentary Questions \(33rd Dáil\) – Houses of the Oireachtas](#)
- [25] DHLGH, 2018. *National Planning Framework*, Ireland. Available at: [310818095340-Project-Ireland-2040-NPF.pdf \(www.gov.ie\)](#)
- [26] DHLGH, 2020. *Planning*. Ireland. Available at: [gov.ie - Planning \(www.gov.ie\)](#)
- [27] IWEA, 2020. *Building Onshore Wind - 70 by 30 Implementation Plan*. Available at: [iwea-building-onshore-wind-report-lr.pdf \(windenergyireland.com\)](#)
- [28] Department of Justice, 2022. *Minister of State James Browne welcomes government decision to establish a dedicated Planning and Environment division of the High Court*. Ireland. [gov.ie - Minister of State James Browne welcomes government decision to establish a dedicated Planning and Environment division of the High Court \(www.gov.ie\)](#)
- [29] Longoria, G., Lynch, M., Farrell, N. & Curtis, J. A., 2022. *The impact of planning and regulatory delays for major energy infrastructure*. ESRI Working Paper, No.725. Available at: <https://www.econstor.eu/bitstream/10419/265903/1/1799719677.pdf>.
- [30] Lyons, R., 2016. *Rail Report 2016; The value of the train..* Available at: [https://ww1.daft.ie/report/ronan-lyons-2016-rail-report?d\\_rd=1](https://ww1.daft.ie/report/ronan-lyons-2016-rail-report?d_rd=1) .
- [31] Lyons, R., 2022. *House Price Report Infographic*. Available at: [https://ww1.daft.ie/report/ronan-lyons-2022q4-dafthouseprice/infographic?d\\_rd=1](https://ww1.daft.ie/report/ronan-lyons-2022q4-dafthouseprice/infographic?d_rd=1) .
- [32] Morgenroth, E., 2018. *Prospects for Irish Regions and Counties: Scenarios and Implications*, Dublin: ESRI.
- [33] NCPC, 2021. *Ireland's Competitiveness Challenge 2021*. Ireland. Available at: [ireland's competitiveness challenge 2021.pdf](#)
- [34] NCPC, 2022. *Ireland's Competitiveness Challenge 2022*. Ireland. Available at: [irelands competitiveness challenge 2022.pdf](#)
- [35] NESC, 2020. *Land Use, Land Value and Urban Development*. Available at: [Land Use, Land Value and Urban Development | The National Economic and Social Council - Ireland \(nesc.ie\)](#)
- [36] OECD, 2022. *Redesigning Ireland's Transport for Net Zero: Towards Systems that Work for People and the Planet*, OECD Publishing, Paris, <https://doi.org/10.1787/b798a4c1-en>

- [37] OPR, 2021. *Review of Louth County Council*. Ireland. Available at: [81 \(opr.ie\)](#)
- [38] OPR, 2021. *Review of Tipperary County Council*. Ireland. Available at: [55 \(opr.ie\)](#)
- [39] OPR, 2022. *Planning Leaflets - The Office of the Planning Regulator*. Ireland: Available at: [Planning Leaflets - The Office of the Planning Regulator \(opr.ie\)](#)
- [40] OPR, 2022. *Review of Galway City Council*. Ireland. Available at: [86 \(opr.ie\)](#)
- [41] OPR, 2022. *Review of Kildare County Council*. Ireland. Available at: [98 \(opr.ie\)](#)
- [42] RDM, 2022. *Our People and Places*. Available at: <https://rdm.geohive.ie/pages/our-people-and-places#CompactGrowth>.
- [43] RIAI, 2020. *Urban Sprawl to Compact Growth - Making Cities Affordable*. Available at: [Urban Sprawl to Compact Growth \(dublincity.ie\)](#)
- [44] Siddharth, J & Deane, P., 2022. *Quantifying the potential for rooftop solar photovoltaic in Ireland*. Available at: <https://www.marei.ie/wp-content/uploads/2022/07/Quantifying-the-Potential-for-Rooftop-Solar-Photovoltaic-in-Ireland.pdf>.
- [45] WEI, 2022. *Bridging the Gap. Towards a zero-carbon power grid*. Ireland. Available at: [bridging-the-gap-a4-report-final.pdf \(windenergyireland.com\)](#)
- [46] OPR, 2022. *Local Authority Planning Sector Learning and Development Strategy*. Available at: [123 \(opr.ie\)](#)