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Office of the  
Planning Regulator

# Reviewing Development Plans Key Trends & Issues

**Niall Cussen**  
Planning Regulator

# OPR Evaluation Process



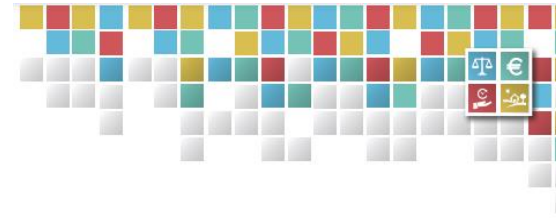
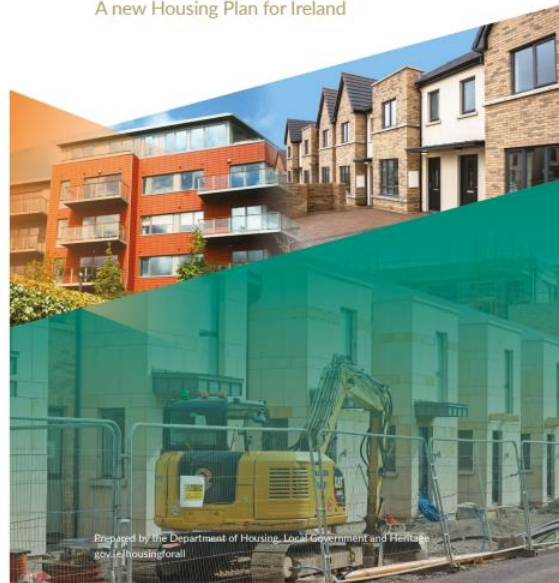
# Plan Preparation in Context



## Town Centre First A Policy Approach for Irish Towns



## Housing for All A new Housing Plan for Ireland



## CLIMATE ACTION PLAN 2023 CAP23

Changing Ireland for the Better

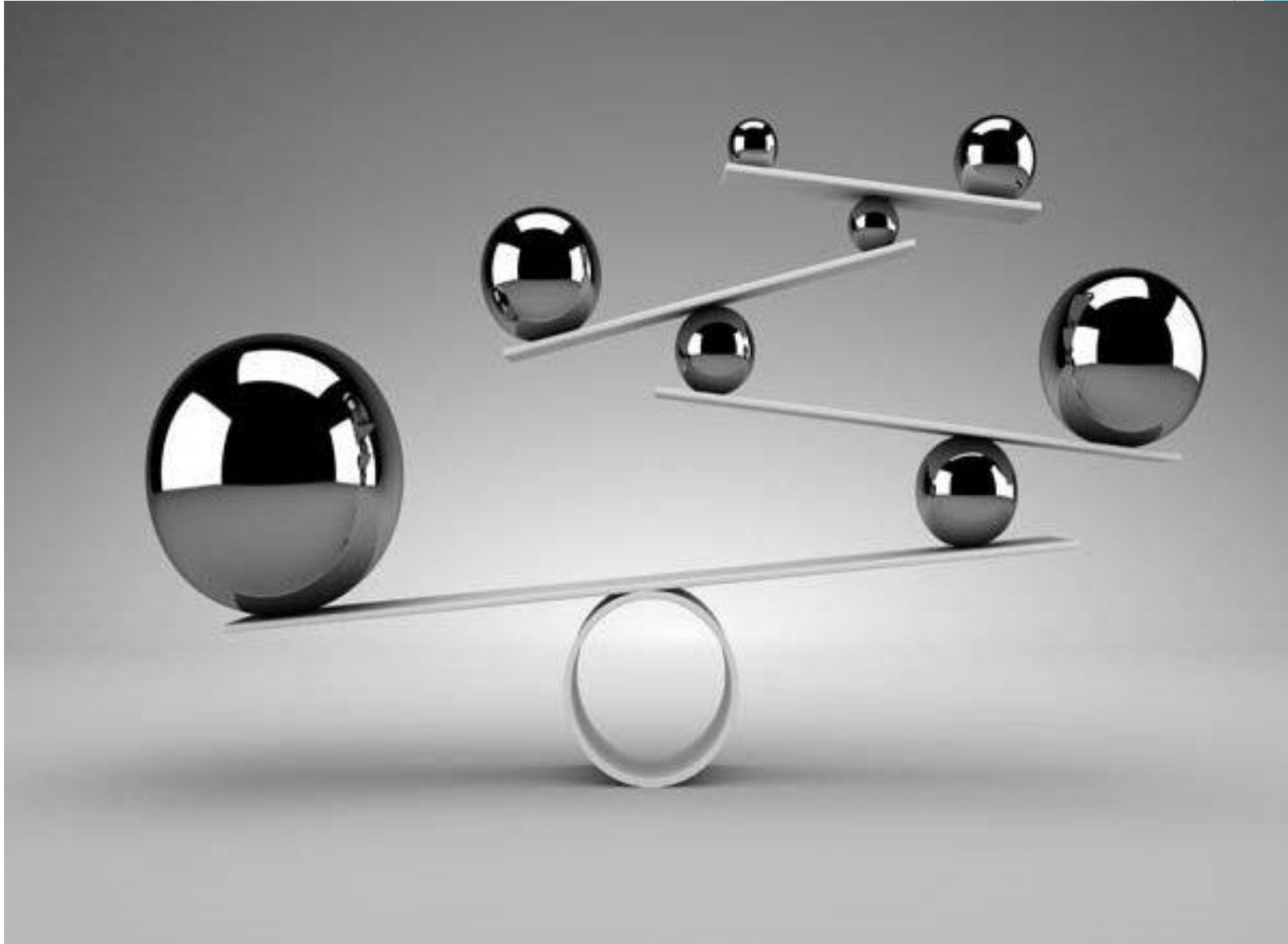


## Planning Policy Statement 2015



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# Balancing between 'local' and 'strategic'



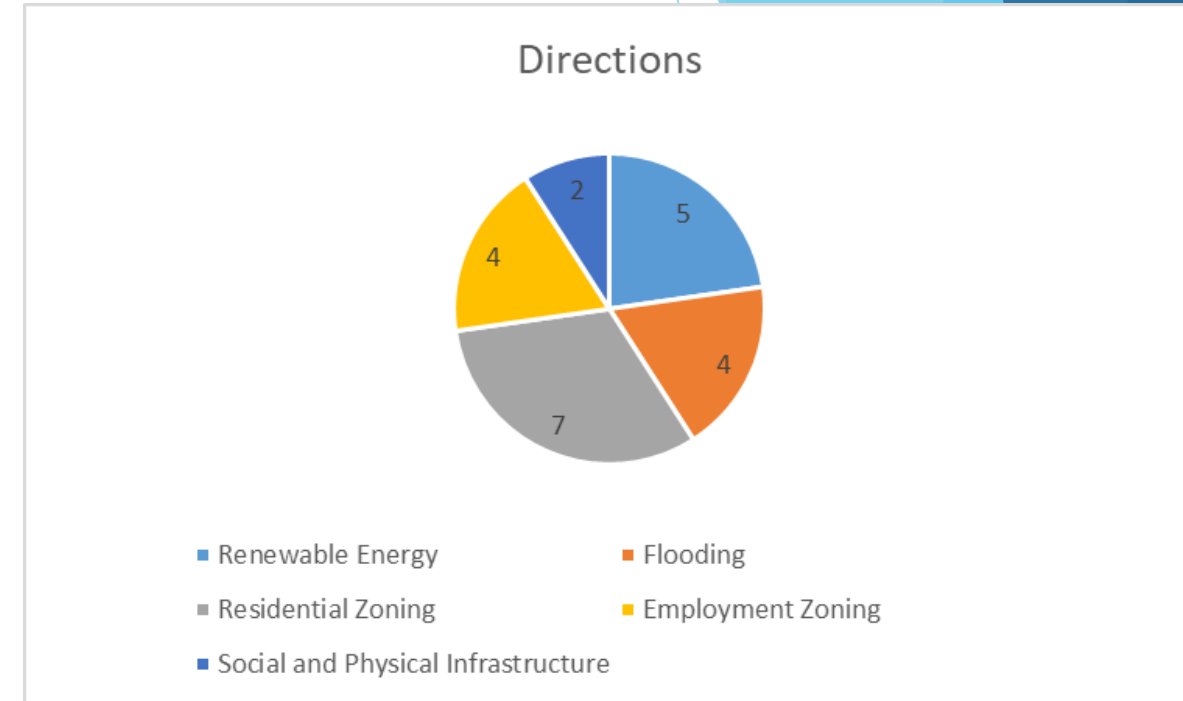
# 2022: A Busy Year!

55 Stages Reviewed  
207 Recommendations  
85 Observations  
12 Draft Directions

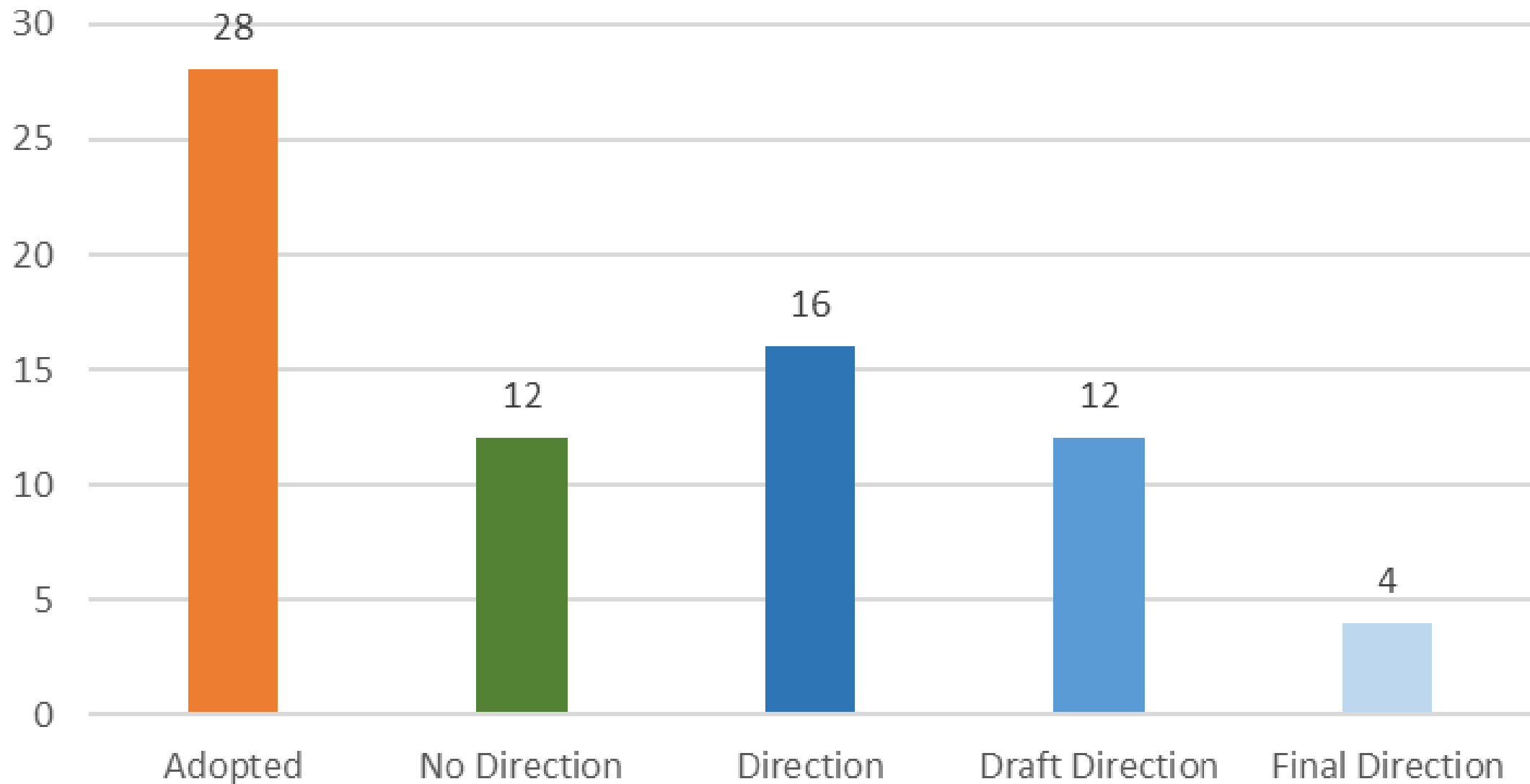


# Directions

- ▶ Significant number of CDP's entailed Directions
- ▶ More avoided by careful responses in EM rationale and CE report
- ▶ Tend to arise in very specific circumstances...
- ▶ Poor strategy/prioritisation in zoning objectives
- ▶ Zoning in areas at risk of flooding
- ▶ Clear conflicts between national/regional objectives and local delivery
- ▶ Implications for infrastructure delivery



## City and County Development Plans





# Housing Supply Targets/ Core Strategy



An Roinn Tithíochta,  
Rialtais Áitiúil agus Oidhreacht  
Department of Housing,  
Local Government and Heritage

## Housing Supply Target Methodology for Development Planning

Guidelines for Planning Authorities issued under Section 28 of  
the Planning and Development Act, 2000 (as amended)

December 2020



Rialtas na hÉireann  
Government of Ireland

## Housing for All

A new Housing Plan for Ireland

Prepared by the Department



Rialtas na hÉireann  
Government of Ireland



## Development Plans

Guidelines for Planning Authorities

Draft for Consultation  
August 2021

Prepared by the Department of Housing, Local Government and Heritage  
[gov.ie/housing](http://gov.ie/housing)

- ❖ Much comment on projections/targets yet delivery much lower
- ❖ Housing Needs Demand Assessment (HNDA) allows for un-met demand & headroom
- ❖ Focus on Plan Period advised
- ❖ Scope to “switch” to other serviced lands if 1<sup>st</sup> priority lands become “stuck”
- ❖ Services Capacity Audits are important

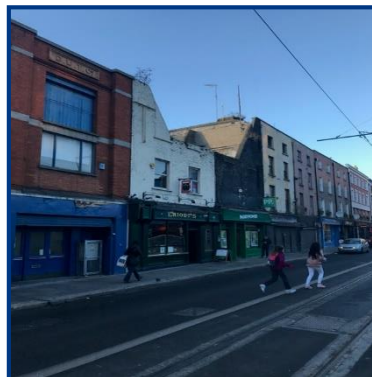


# 67,000 homes could be built on State land

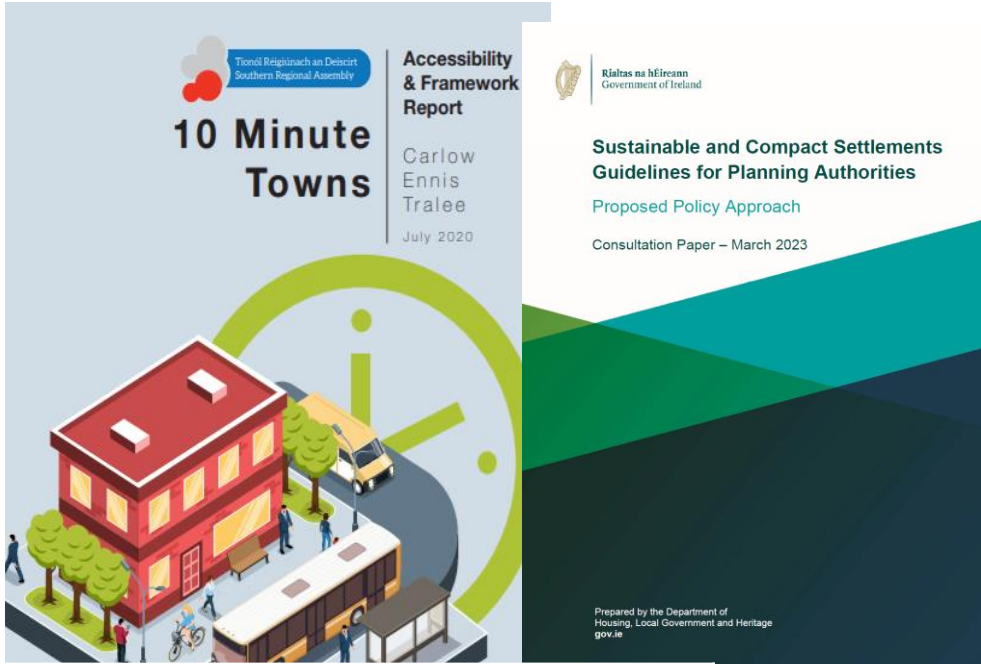
■ But less than 10,000 can be delivered within decade: report

# 6,000

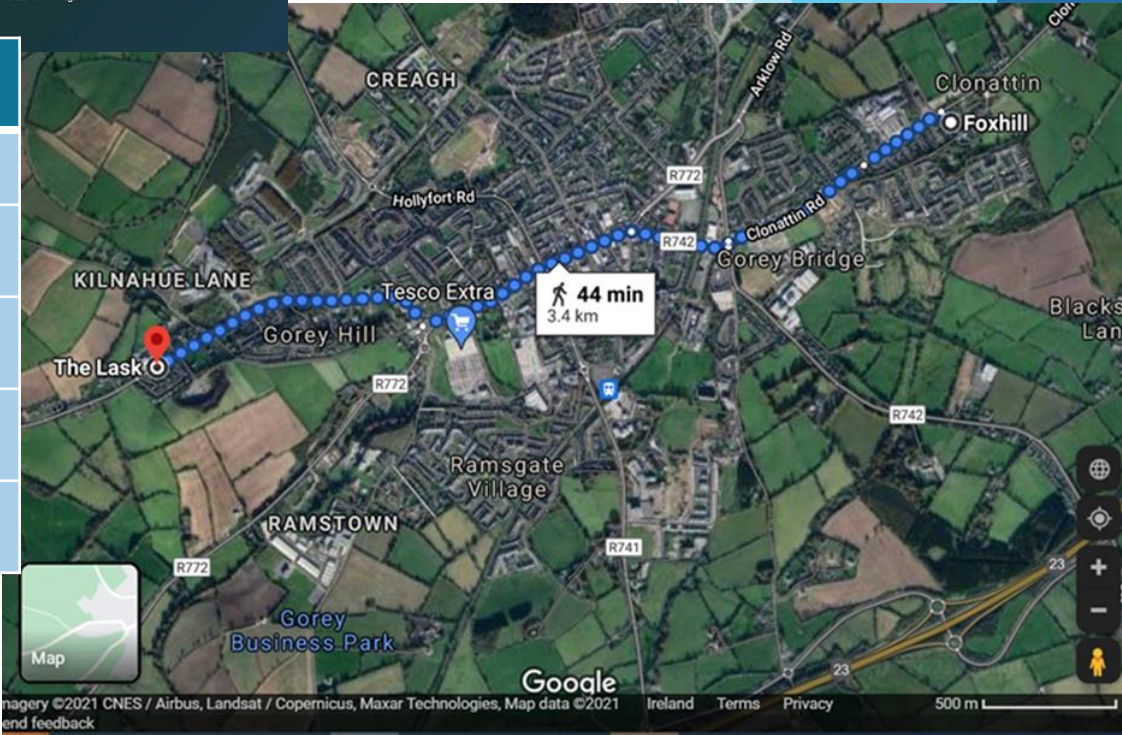
A large crowd of people is gathered on a residential street in Liverpool, looking towards a building at the end of the road during sunset. A dark blue car with license plate 5862 is in the foreground. The scene is captured from a low angle, showing the backs of several people in the crowd. The street is lined with brick buildings on the left and trees on the right. The sky is a mix of orange and pink, indicating the time is dusk. The crowd is diverse in age and appearance, all focused on the building at the end of the street. The car in the foreground is a dark blue hatchback, and its license plate is clearly visible. The overall atmosphere is one of anticipation and public interest.



# Density



Case study: 2,500 homes	
Average Density (dph)	Land Requirement
25	100 ha
35	71 ha
40	62 ha
45	55 ha





## Density

Have the appropriate densities been used to provide a sound basis for the quantity and location of residential zoned land to meet housing needs for the next 6 years?

- ❖ 'Blanket' average densities inconsistent with the Guidelines
- ❖ Tailored approach identifying where any particular density would be appropriate having regard to the specific circumstances.
- ❖ Viability of higher densities can be challenging – carefully consider what planning policy can do to enhance...



*Cork County Draft Development Plan*



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# Viability

**€271,950**

**VS**

**€330,493 (3 bed semi)**

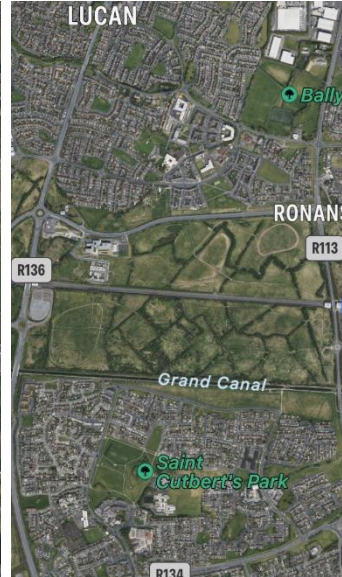
**€358,899 (2 bed apt)**

# Sufficiency of Zoned Land...

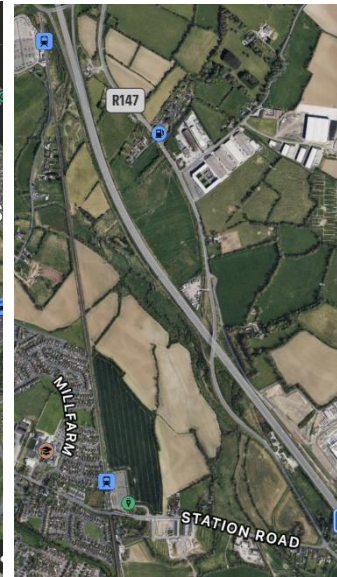
- Sites capable of 50,000 homes+
- €Bns taxpayers money invested – rail – water - schools
- Zoned
- Serviced
- Approved (mostly)
- Not enough starts..
- Why?
- Viability
- Finance
- Funding



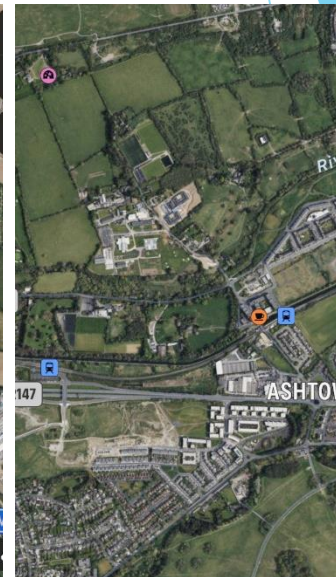
Clongriffin



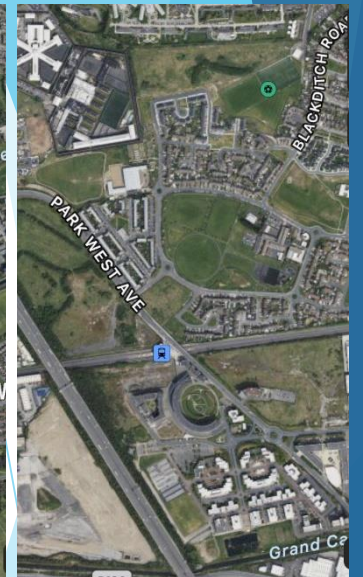
Clonburris



Dunboyne



Ashtown/  
Pelletstown



Park West

# NPF vs Actual Scope for Housing in Plans

	Estimated housing delivery based on current CSO completions	NPF/ Housing Supply Target	Residential zoned land yield
SDCC	5,838	15,094	23,731
DLRD	10,950	15,225	25,350
Fingal	11,352	16,245	27,615
Cork County	9,360	18,500	25,080

*Data for relevant 6 year plan period – eg 2022-2028*



# Land Activation

- ▶ Kellystown Local Area Plan 2021 – clear framework plan for key development areas.
- ▶ Newcastle West Draft LAP 2023 – identifies key opportunity sites to encourage the restoration, consolidation and improvement of lands within the town core.
- ▶ Sets out design brief for The Square.



Figure 5.2: Kellystown Opportunities in Context

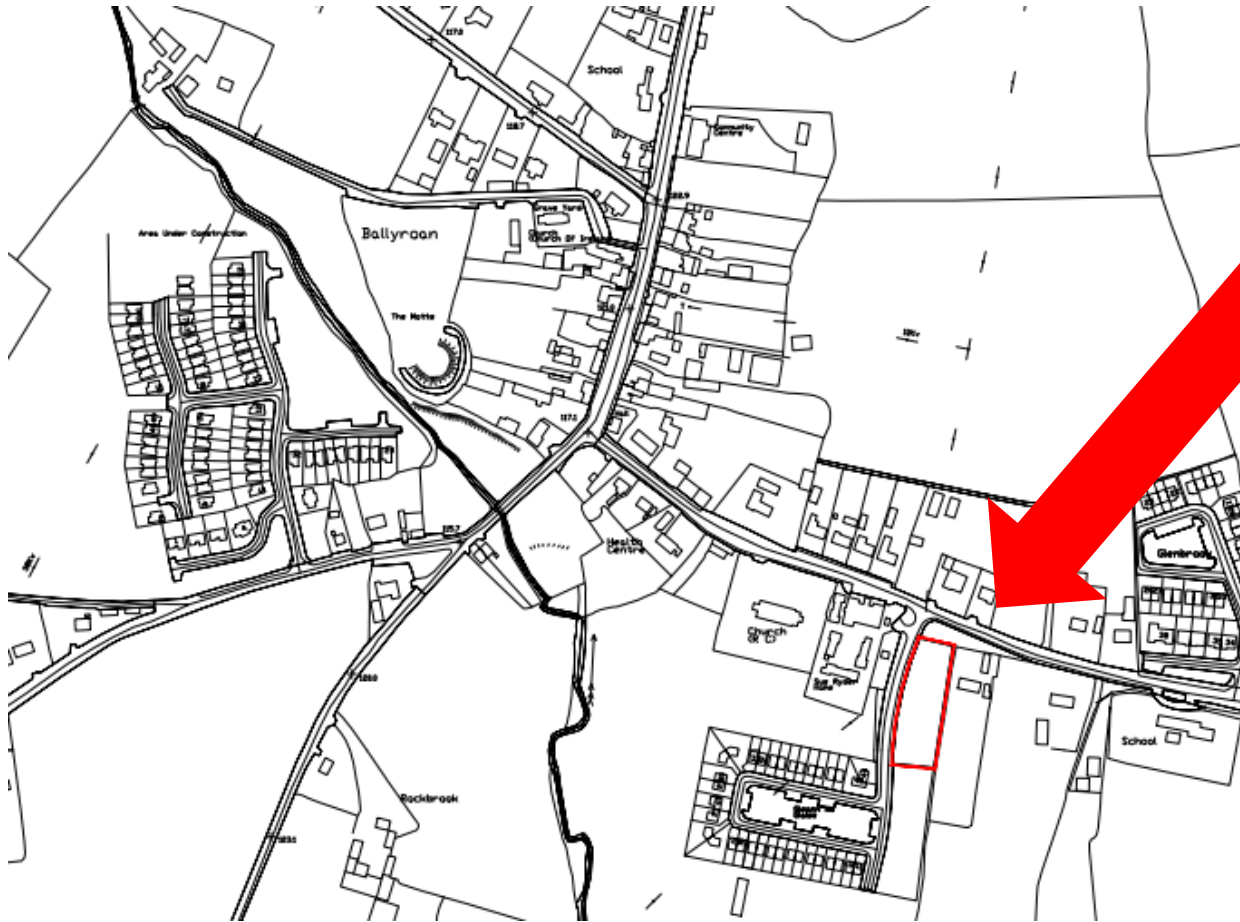


# Laois CDP – Serviced Sites

- ▶ Adopted plan contains strong policy support for serviced sites

Rural Areas Policy Objectives	
CS 30	Support housing at an appropriate scale and repopulation taking place within villages in a consolidated, sustainable and sequential manner, priority will be given to refurbishment of existing houses or appropriate replacement to current building standards within the existing footprint.
CS 31	Promote the provision of serviced sites in line with investment opportunities by Irish Water in order to attract people to build their own homes and live in villages.
CS 32	Facilitate the expansion of villages and small towns to provide for employment, retail and social opportunities at an appropriate scale subject to normal planning requirements.
CS 33	Support the servicing of rural villages (serviced sites) to provide an alternative to one-off housing in the countryside, in line with RSES Objective RPO 4.78.
CS 34	Within the designated development limits of the rural villages in Volume 2, development will be permitted where it involves infilling, conversion, single site housing development, or the use of derelict or underused land or premises, subject to siting, design, protection of residential amenities and normal development management criteria.

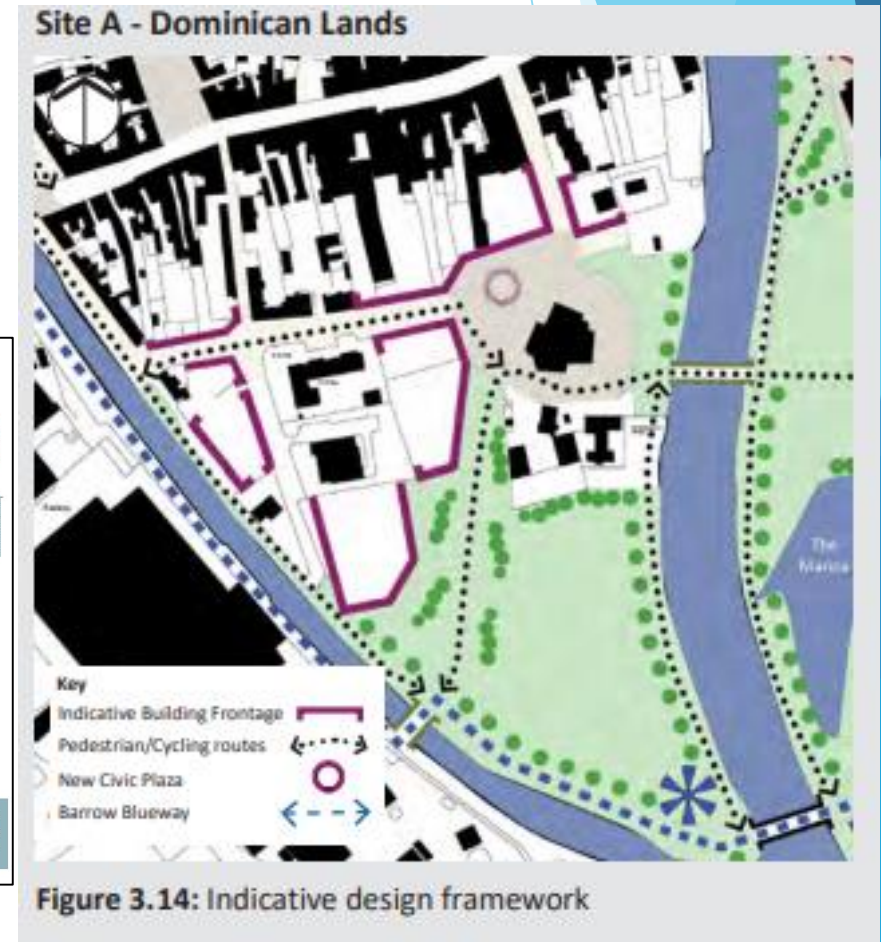
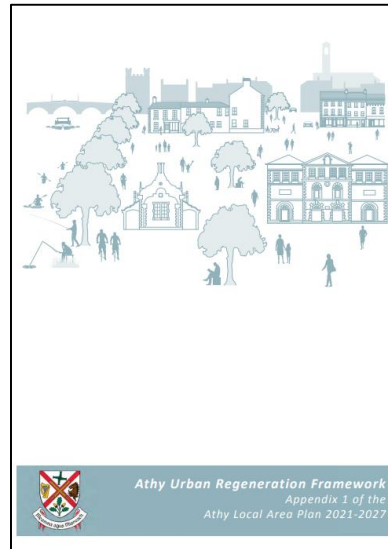
# Serviced Sites - Croí Cónaithe (Towns) Fund



- **Ballyroan, Co. Laois**
- 4 no. ready to build sites
- Discounted price of €30,000
- Similar scheme in Durrow, Co. Laois

# Urban Regeneration Framework: Athy LAP

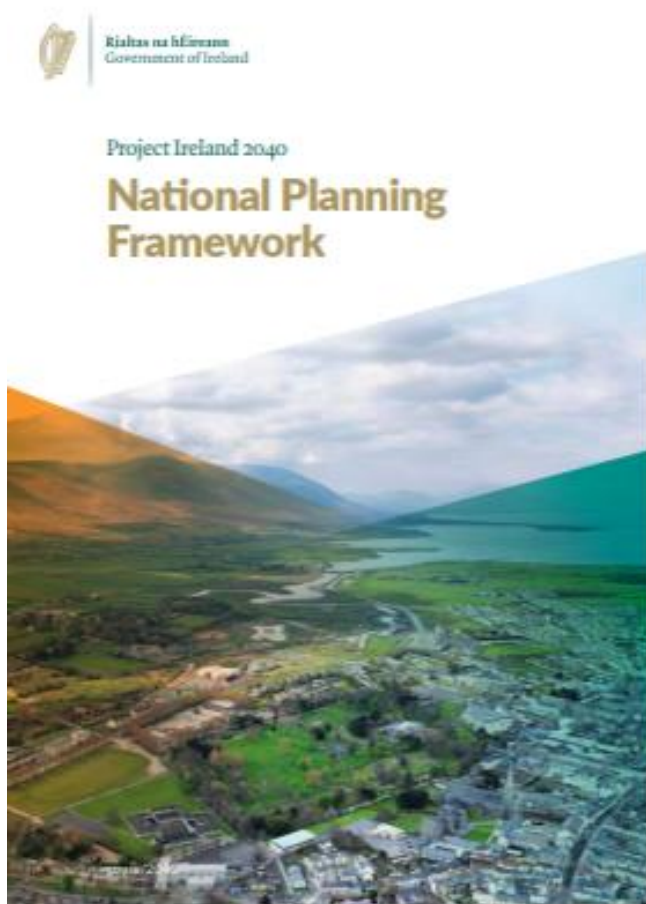
- Prepared in tandem with the Athy LAP
- Integrated strategy for rejuvenation
- Key aims: vacancy, brownfield sites, public realm, sustainable mobility...
- Vacant Site Levy designation...





# Climate Mitigation- Renewable Energy

National Planning Objectives  
54 & 55 and RPOs



Climate Act



## CLIMATE ACTION PLAN 2023 CAP23

Changing Ireland for the Better



Wind Energy Guidelines

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1(a) Large wind energy development with random layout, irregular spacing and high turbines - this siting and design option is appropriate given the scale of this landscape



1(b) Wind energy development with many turbines of medium height - this can be inappropriate. The spatial extent of a wind energy development can be reduced by using taller turbines. This may be a preferable solution in some situations.

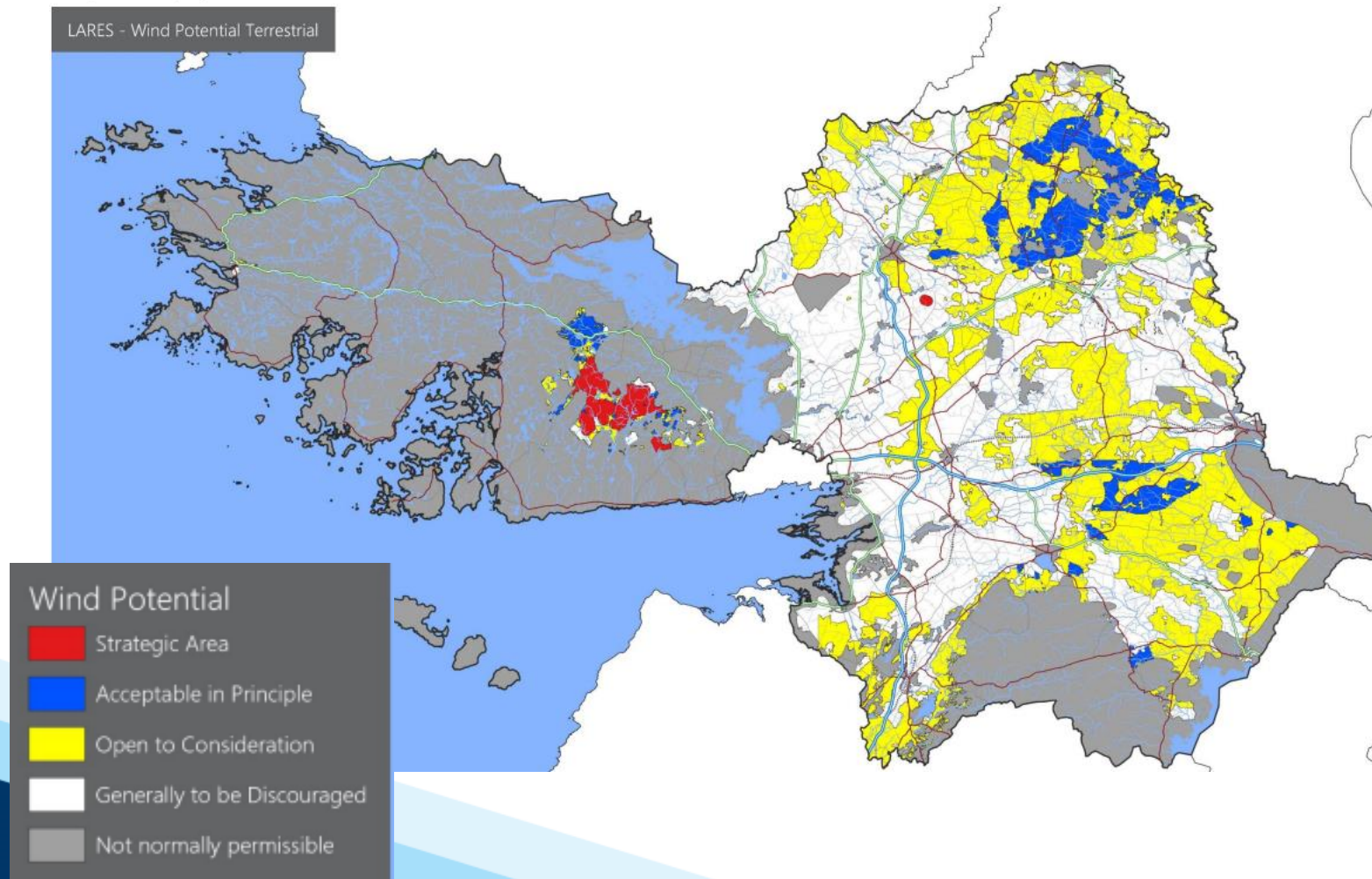


1(c) Wind energy development with relatively few and tall turbines.

### Spacing

All spacing options are usually acceptable. Where a wind energy development is clearly visible on a crest or ridge there is considerable scope to vary the rhythm, though on simple ridges, regular spacing may be more appropriate. On sweeping and continuously even areas of mountain moorland or upland plateaux regular spacing may be most desirable.

# Galway County Council Renewable Energy Strategy (RES)



- Good engagement
- Detailed in-house RES - evidence-based approach with proper resource assessment for WE and SE, taking account of all constraints and all infrastructure opportunities
- Clear regard to section 28 Ministerial guidelines & consistent with national obligations and policy with target to 2030
- Full range of renewables considered and included



# Carlow County Council Renewable Energy Strategy

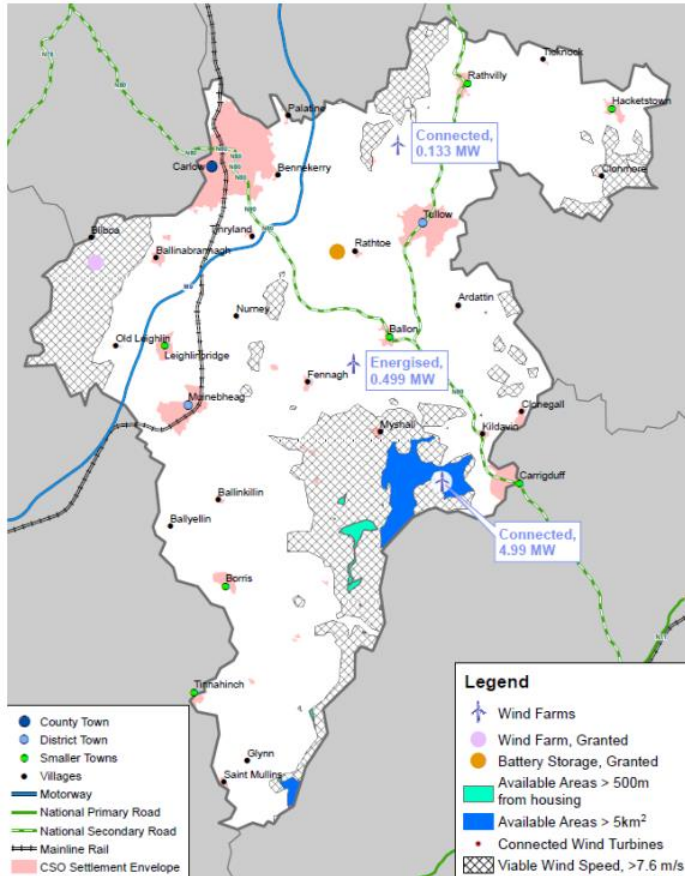


Figure 7.7: Wind Energy Opportunities and Constraints

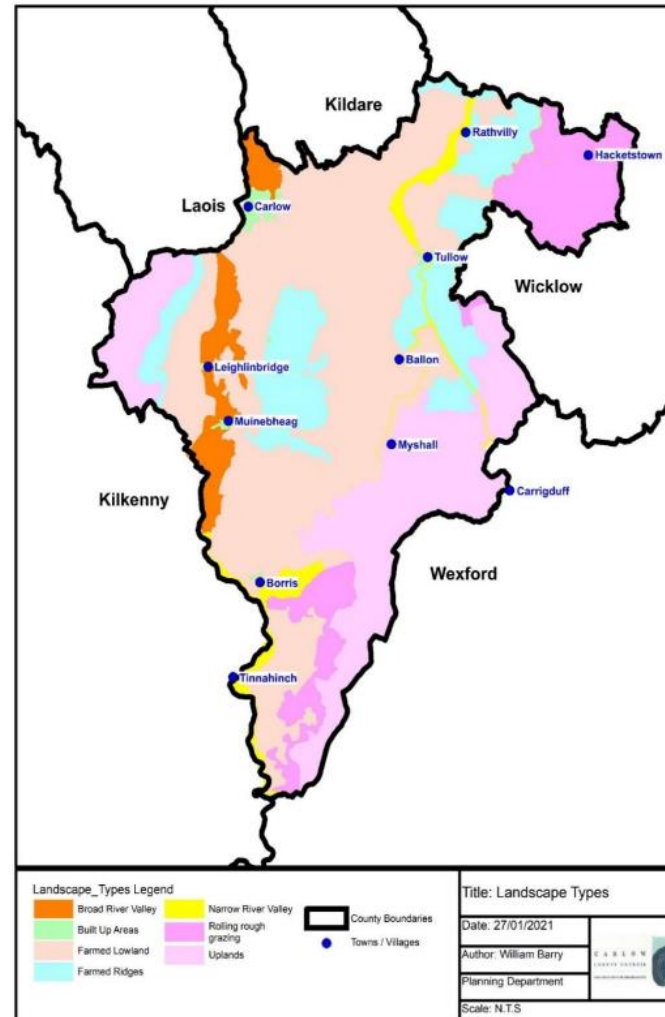


Figure 7.8 Landscape Character Types

- Good engagement & discussion with OPR prior to plan review
- Evidence-based approach to assessing potential for wind/solar taking account of opportunities & constraints
- Regard to section 28 Ministerial guidelines
- Wind target low relative to national obligations to 2030
- Full range of renewables considered

# Climate Adaptation: Flood Risk

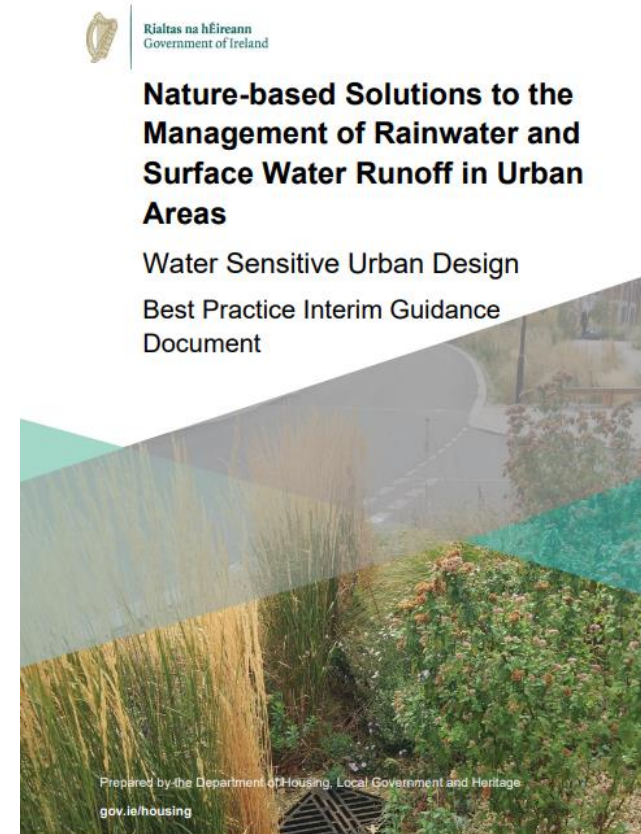
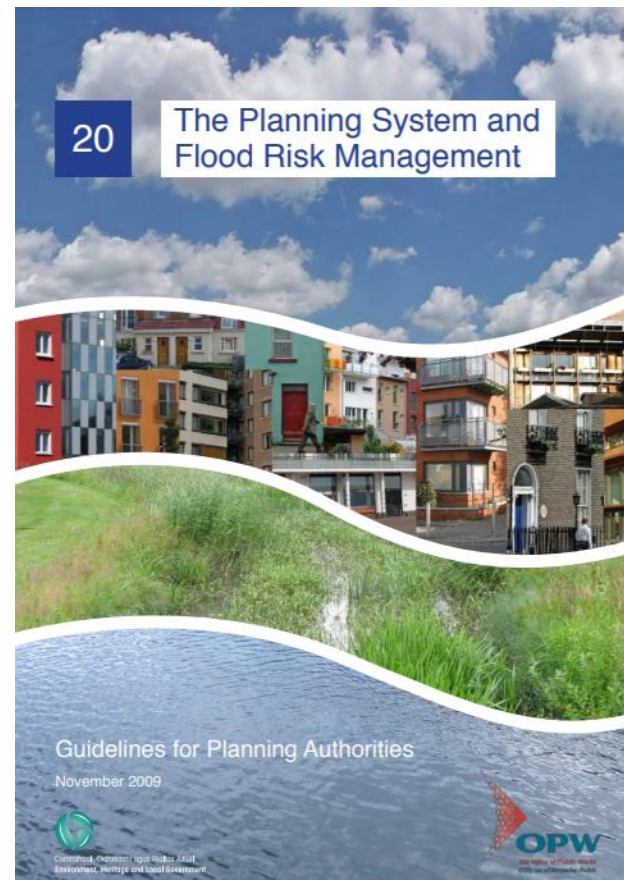
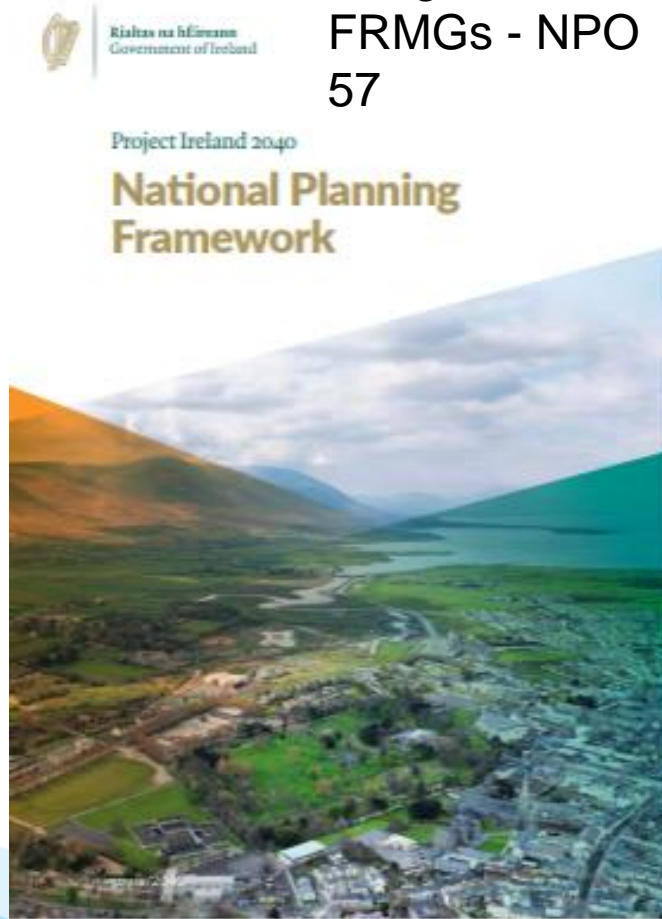


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Obligation on  
FRMGs - NPO  
57

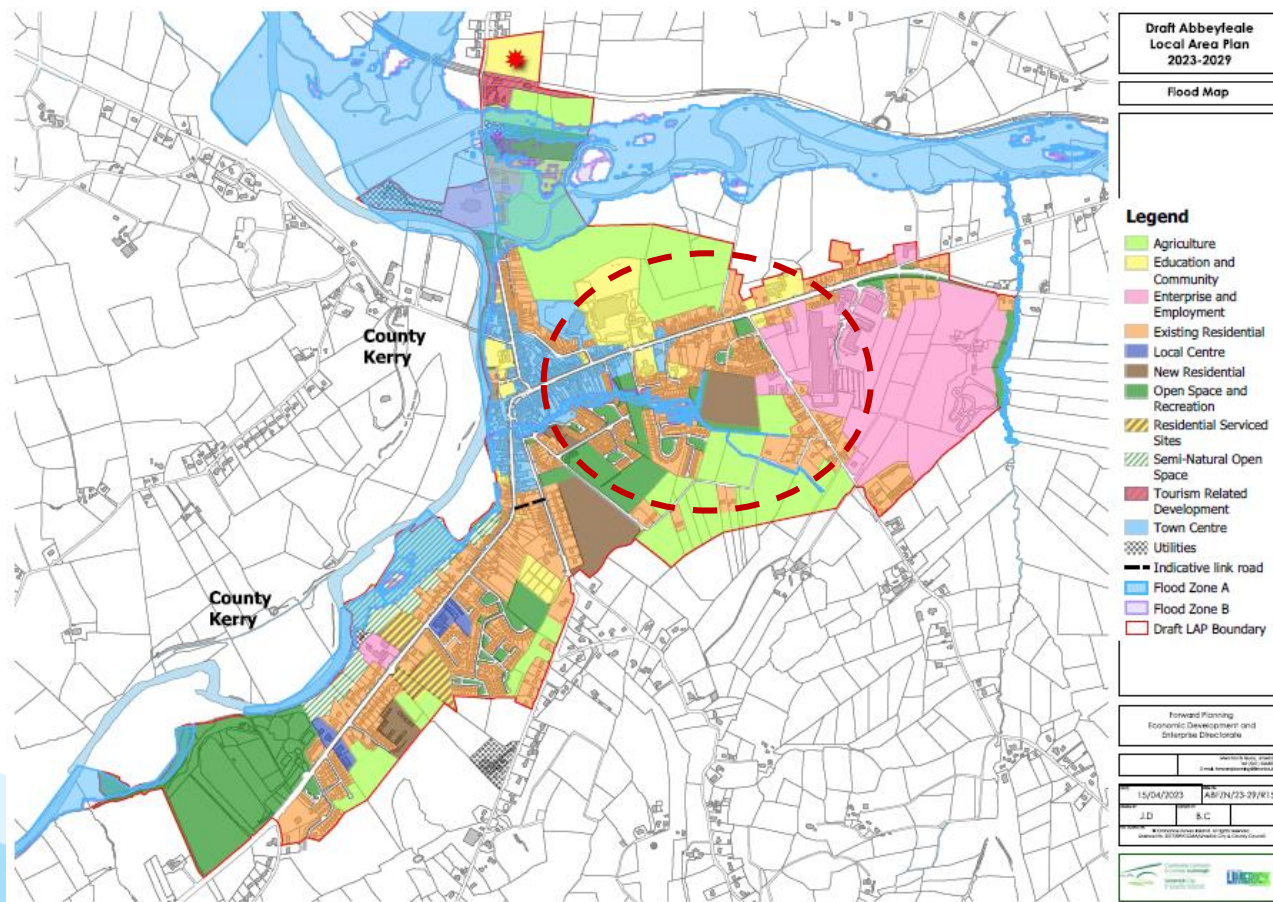
Evidence-based  
approach  
FRMGs 2009

Advisory, best practice  
approaches





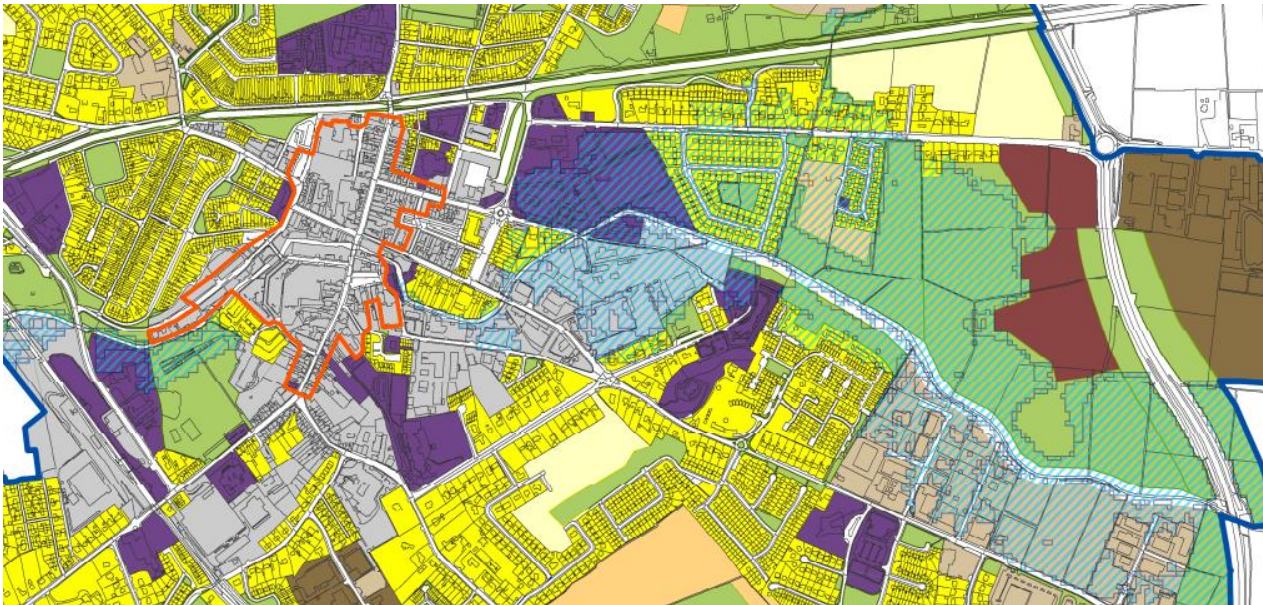
# Abbeyfeale draft LAP - SFRA



- Flood risk recurring issue
- Local authorities, such as Limerick have addressed flood risk proactively and on an evidence-based approach
- Smaller catchments typically not covered by OPW CFRAMs requiring stage 3 assessments under SFRA
- Limerick commissioned its own stage 3 assessment for part of the town to resolve this issue.

# Offaly CDP

- ❖ Overlaid flood maps on zoning maps
- ❖ Justification Test for each individual site – not settlements
- ❖ Good liaison with OPW





# Sustainable Water Management Lissenhall East LAP

- Lissenhall LAP makes space for water
- Enhances biodiversity, recreation and local character
- Incorporates attenuation pond, swales, landscaped areas.

Figure 6-2: Flood Risk Areas

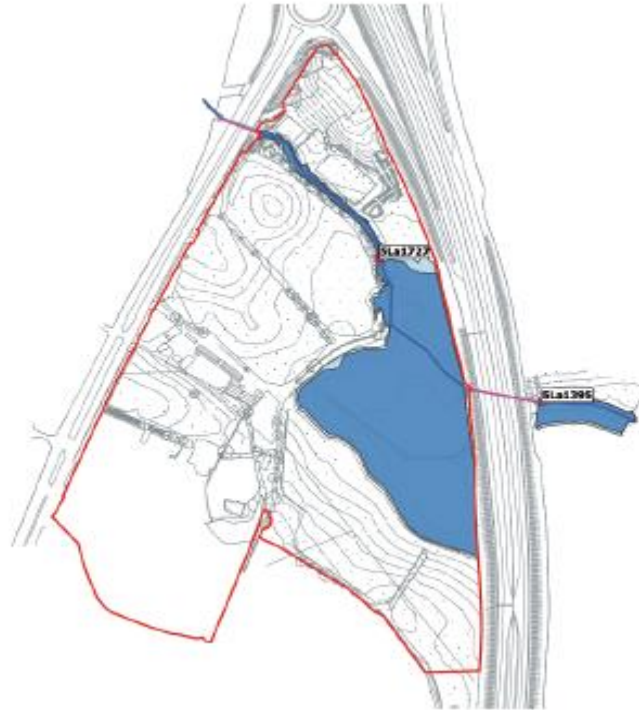
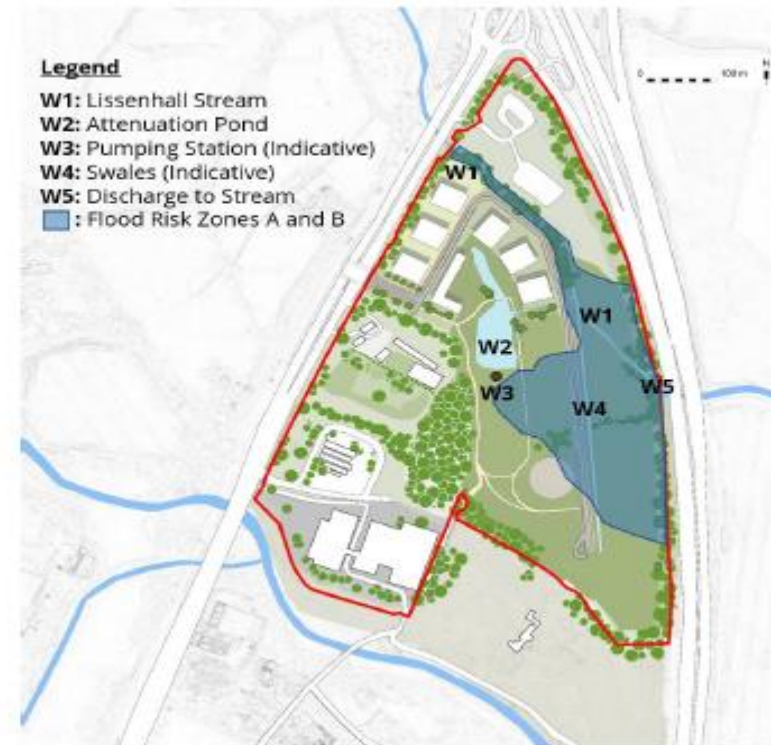


Figure 6-3: Sustainable Water Management



# Implementation and Monitoring



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Planning authorities recognising the importance of monitoring plan implementation

Good examples included in recent CDPs and LAPs

## Draft Castleconnell Local Area Plan 2023 - 2029



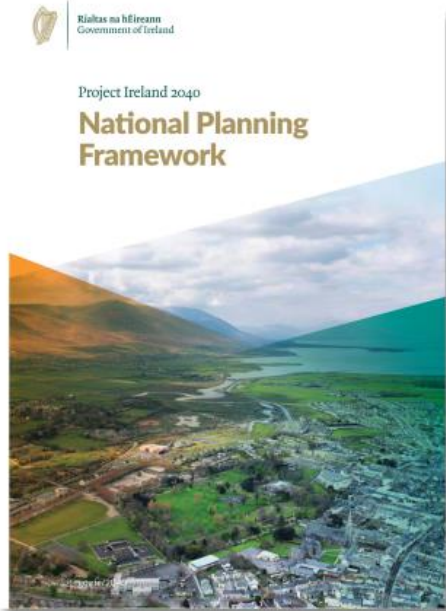
### 15.5.2 Core Strategy

Policy Objective	Strategic County Outcomes					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Climate Resilience	Compact and Connected	Liveable County	Inclusive and Healthy	Vibrant Economy		
CS1 – Housing Need Demand Assessment			✓	✓		Review the HND 2022-2028.	Review the DLR HND 2022-2028 subsequent to the preparation of a Regional HND.
CS2 – Core Strategy	✓	✓	✓	✓	✓	Development management.	New dwelling completions. Data source: CSO.
CS3 – Supply of Zoned Land		✓	✓		✓	N/A	New dwelling completions. Data source: CSO.
CS5 – Strategic Land Reserve		✓	✓			Development management and LAP plan-making.	Assessment through development management functions and LAP provisions.
CS6 – Lands for Employment Use		✓	✓		✓	Spatial analysis.	Land availability study of employment zoned lands. Data source: Various.
CS7 – Strategic Employment Locations		✓	✓		✓	Development management.	Quantum of employment development in strategic employment locations. Data source: Planning data (APAS).
CS8 – Ecosystem Services Approach	✓		✓			Plan-making.	Application and specific recognition in LAPs identified as part of the LAP plan-making programme.

	Action	Lead Responsibility	Timeline
<b>Action 1</b>	Opportunity Site 1: Local Park and associated infrastructure to facilitate pedestrian and cycling access from Scanlon Park through Bruach na Sionna to the village	LCCC Planning, Environment and Place-making Directorate	Short-medium term
<b>Action 2</b>	Opportunity Site 2: Worlds End	LCCC Community, Tourism and Culture Directorate	Medium – Long term
<b>Action 3</b>	Village Centre Traffic Management Plan and public realm upgrades	LCCC Transport and Mobility Directorate /Planning, Environment and Placemaking	Medium – Long term
<b>Action 4</b>	Extension of existing and develop further Walking and Cycling facilities in the village	LCCC Transport and Mobility Directorate	Medium term
<b>Action 5</b>	Equipment upgrade, maintenance and Playground Extension	LCCC Planning, Environment and Place-making Directorate	Short-medium term
<b>Action 6</b>	Feasibility project for a Greenway extension from the University of Limerick through Castleconnell to Montpellier	NTA, Roads Design Office, Department of Transport, LCCC Transport and Mobility Directorate	Short – medium term
<b>Action 7</b>	Improved active travel connectivity and safety works including: between Castlerock and the village centre	LCCC Transport and Mobility Directorate	Medium term
<b>Action 8</b>	Provision of a Park and Ride	LCCC, NTA and Iarnrod Eireann	Medium – Long term



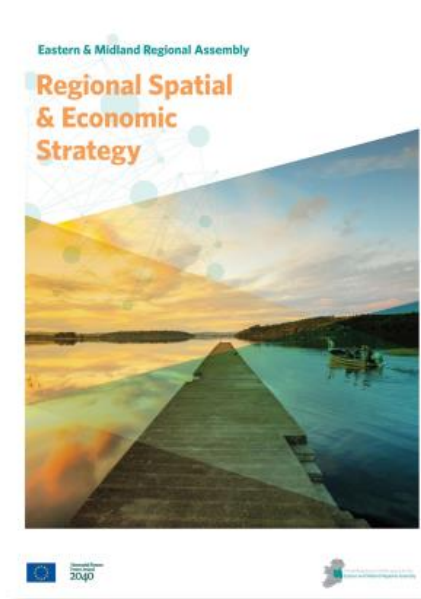
# CDP Reviews: Better Co-ordinated Plans



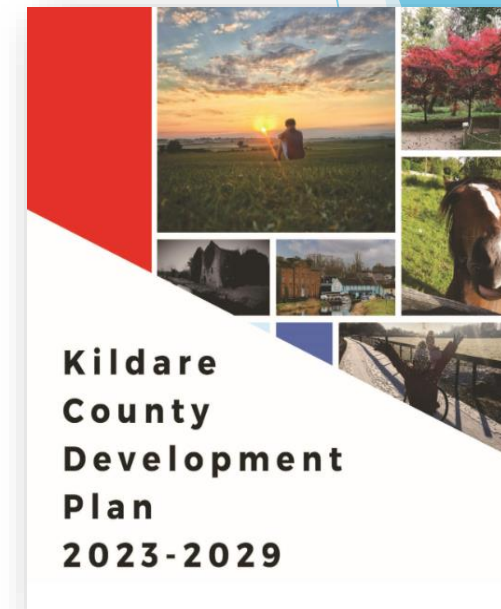
NPF



NPF Roadmap



RSES



CDP



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# CDP Reviews: Overall Results



**Huge effort:** better consistency, transparency, certainty



**Significant learning:** - clearer basis for investment & planning decisions



**Greater focus:** delivery of local planning objectives through LAP's



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