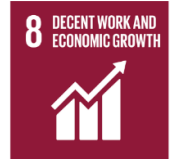




**Chambers
Ireland**
Advancing business together



National Planning Excellence Framework

Submission by Chambers Ireland

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About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are affiliated Chambers in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities. We are the only business organisation with a truly geographic footprint and as a result are uniquely positioned to assist in the development of critical infrastructure to meet our economy's future needs.

Our perspective

Excellence in Irish planning should be judged by whether the system helps deliver the infrastructure required to enable development in every location identified for growth. The State has too often had plans that point in the right direction while delivery is held back by water and wastewater constraints, grid limitations, slow sequencing of transport investment, uneven plan implementation, staffing gaps and litigation or appeals exposure. This has severely impacted sustainable development across the State and the impacts are felt acutely by employers, for whom housing scarcity translates into recruitment and retention difficulties and into wage pressures that track escalating rental costs.

A further, often underweighted constraint is the exposure of consented schemes to judicial review: even where a decision is legally sound, the often-frequent introduction of fresh challenges introduce delay, cost, and uncertainty that stall a project's financing and construction timetable long after consent has been granted. Processing challenges expeditiously without eroding legitimate rights of challenge is therefore as material to housing delivery and economic development as the speed of the original decision, since a system that grants permission quickly but leaves it vulnerable to prolonged legal contest achieves little net gain in deliverable supply.

The scale of the challenge is well documented. The CSO recorded 36,284 new dwelling completions in 2025, the highest figure on record,¹ yet this remains well short of the number of homes per year that are needed to meet structural demand.² That gap will not close unless the water, wastewater, transport and energy infrastructure that enables housing is consented and

¹ Central Statistics Office, New Dwelling Completions Q4 2025 (29 January 2026): 36,284 completions in 2025, the highest annual figure since the series began in 2011: <https://www.cso.ie/en/releasesandpublications/ep/p-ndc/newdwellingcompletionsq42025/>.

² Bergin, A. and García-Rodríguez, A., Population projections, the flow of new households and structural housing demand, ESRI Research Series (July 2024), estimating average structural demand of approximately 44,000 dwellings per annum for 2023–2030 in the baseline scenario: <https://www.esri.ie/publications/population-projections-the-flow-of-new-households-and-structural-housing-demand>.

built on time. This is equally applicable to renewable energy projects being held back by the system, and the significant catch-up the State needs to do if it is to achieve its climate action targets.

The planning system also needs to distinguish more clearly between zoned land and land that can be activated. The litmus test for an effective framework is therefore whether local and regional plans are aligned with facilitating infrastructure, prompt decisionmaking, and provide the minimum certainty that developers require to commit capital. Without that alignment, sites remain undeliverable regardless of how efficiently they pass through the planning system, because the underlying conditions for build-out - including but not limited to the associated necessary infrastructure - are never resolved in step with the decision.

1. A Sustainable, Plan-led System

Question 1: Give an example of what an excellent sustainable, plan-led system would look like for you in relation to your interaction with the planning system?

A genuinely sustainable, plan-led system is one businesses can actually plan around. Decisions need to follow clear, consistent plans with national, regional and local policy pulling in the same direction so people know what to expect.

A plan-led system is only as credible as the infrastructure assumptions underneath it. In Ireland, land is routinely zoned for housing that cannot be built because wastewater treatment, water supply or grid capacity does not exist and is not programmed. Zoned land and deliverable land are not the same thing, and the Framework should stop treating them as though they were.

As an example, the consequences are visible in the housing delivery in areas that have been constrained for years by the absence of the Greater Dublin Drainage project, and where water supply for 1.7 million people continues to depend overwhelmingly on a single source pending delivery of the Water Supply Project Eastern and Midlands Region. This is a project that was first identified as a critical need in the mid-1990s, however it has been subject to numerous lengthy legal proceedings including judicial reviews which have substantially driven up costs across numerous areas.

Recommendations:

1. Every development plan and area-based plan should be required to identify the specific utility, transport and energy investments on which its growth strategy depends, the body responsible for each, and the funding route. Plan-making that allocates growth without a matching infrastructure programme should not be assessable as “excellent” under the Framework.
2. The Framework should adopt, as a headline indicator, the proportion of zoned residential land that is serviced or serviceable within the plan period, and require planning authorities to publish annually why stalled zoned land is not progressing.

Question 2: In your opinion, what supports or reforms are needed to deliver a sustainable, plan-led system?

Plans will work effectively if they meaningfully guide decisions in practice. The 2024 Act provides a strong foundation, particularly through better alignment between national, regional and local policy, but legislation alone will not deliver actionable reform. The system fundamentally needs adequate resourcing and a focus on implementation.

The first reform required is a tighter link between land-use planning and infrastructure programming. Too often the planning system allocates growth first and then deals with servicing constraints afterwards. The framework should require each development plan and relevant area-based plan to identify the utility, transport and social infrastructure assumptions that underpin its growth strategy, along with which body is responsible for delivery and the funding route expected.

Second, consistency should be strengthened across the tiers of planmaking. This is necessary given the inconsistency with which guidelines are interpreted in different counties, which manifests in confusion for renewable energy projects which would help the State meet its climate action objectives. The risk in the current reform cycle is that stronger alignment is not interpreted as a delivery exercise. A more useful approach is to consider whether local plans give practical effect to national objectives and in a way that can be implemented.

Third, the State urgently requires a clearer system for land activation. A significant amount of debate still treats zoning as the principal planning lever, when many bottlenecks sit elsewhere:

- fragmented ownership,
- contamination,
- abnormal costs,
- access constraints,
- utility deficits; and
- long delays in complementary consents.

Accordingly the framework should encourage authorities to monitor stalled zoned land and publish reasons why it is not progressing. They should also trigger targeted interventions where the public interest in delivery is strongest and this can be ascertained by defining the relevant climate and economical needs.

Finally, plan review mechanisms need to be disciplined but retain flexibility. Ten-year development plans can improve certainty, but only if there is a practical way to adjust where major infrastructure assumptions, demographic trends or national policy change materially. A plan-led system should reduce ad hoc departures, but it should not trap authorities into outdated assumptions.

Question 3: Name some appropriate indicators to monitor the successful implementation of a sustainable, plan-led system.

The most useful indicators would be:

1. Share of zoned residential land that is serviced, serviceable within a defined time period, or dependent on major upstream investment;
2. Permissions, commencements and completions in designated growth areas compared with plan targets;
3. Rate of housing and employment development on brownfield, infill and regeneration sites;
4. Proportion of development plans and area-based plans demonstrably aligned with the National Planning Framework and relevant National Planning Statements within the required review cycle;
5. Proportion of plan-led growth locations matched by identified utility and transport investment pathways;
6. Number and scale of material departures from adopted plans, with reasons recorded;
7. Vacancy and dereliction trends in town and city centres where regeneration is a stated planning objective.

Question 4: What benefits or outcomes do you envisage on foot of improved sustainable, plan-led planning in Ireland?

The biggest gain would be confidence, that housing, infrastructure and jobs can actually be delivered in a coordinated, predictable way. When plans are clear and well implemented, businesses and the public can make decisions without second-guessing the system.

It would also mean growth lands in the right places, backed by the infrastructure to support it, making it easier to prioritise investment and keep services ahead of demand rather than playing catch-up. There would also be a direct housing benefit. The CSO recorded 36,284 completions in 2025³, which was a strong increase on 2024, but ESRI work has pointed to average structural demand of up to 53,000 homes per year over 2023–2030⁴. The gap is not explained by planning alone, however an improved and more efficient plan-led system would help by creating a more dependable pipeline of serviced and deliverable sites.

At regional level, the payoff would be more balanced development. If planning, utility investment and transport sequencing are better aligned, growth is less likely to default into a small number of already constrained locations. That would support the wider aims of the NPF and make it easier to sustain employment growth outside the most pressurised areas.

³ <https://www.cso.ie/en/releasesandpublications/ep/p-ndc/newdwellingcompletionsq42025/>

⁴ <https://www.esri.ie/news/between-35000-and-53000-dwellings-needed-per-year-based-on-various-projected-population-growth>

2. Effective and Timely Decision Making

Question 1: What would represent excellent effective and timely decision making for you in relation to your interaction with the Irish planning system and its processes?

This pillar is where the Framework will succeed or fail, and it cannot be addressed by looking at first-instance decisions alone. For critical infrastructure of national importance, the binding constraint on timeliness has become the length of the end-to-end consenting pathway once appeals and judicial review proceedings are included.

Such strategically important applications need thorough assessment, however given the importance of the projects involved, the timetable for that assessment should still be actively managed. While the new statutory timelines in the Planning and Development Act 2024 are welcome, their value will depend on whether the institutions involved are resourced to meet them without lowering the quality of decisions. Such issues manifest in the issues with project delivery and the associated costs which can only be resolved through adequate resourcing of institutions.

‘Excellence’ as stipulated in the consultation document will only be achieved if it considers these action points. It may be emulated from other small European jurisdictions that have shown that a single, properly resourced judicial instance operating to firm timelines can determine infrastructure challenges within six months while preserving full rights of challenge.⁵

⁵In the Netherlands, challenges to designated major projects are heard at first and only instance by the Administrative Jurisdiction Division of the Council of State, with an accelerated procedure and a six-month target for judgment introduced by the Crisis and Recovery Act 2010 and carried into the Environment and Planning Act framework. In Germany, section 50 of the Code of Administrative Court Procedure (VwGO) confers first and only instance jurisdiction on the Federal Administrative Court for challenges to specified infrastructure projects, a list extended by the Investment Acceleration Act 2020 and the LNG Acceleration Act 2022. In both systems a single, well-resourced judicial instance with statutory or target timelines has materially shortened litigation without removing the right of challenge.

Impacts within the current system on project delivery

More than 628 judicial review cases have been taken against An Coimisiún Pleanála since 2020, with 253 of those lodged in the 18 months to mid-2025 alone.⁶ Often, a judicial review typically spends 12 to 24 months in the court system before the underlying project can move.⁷ For critical infrastructure, where a quashed decision is remitted and re-decided, and the new decision is challenged again, those periods compound and drive up costs significantly.

The Greater Dublin Drainage project is the clearest illustration. While the project was estimated to be operational by 2025, it will not now be delivered until the early 2030s. Consequentially its estimated cost has doubled from €650 million to €1.3 billion over the period of delay.⁸ Every year of litigation on that one project has added, on average, roughly €100 million to its cost - costs ultimately borne by the public - while housing delivery across impacted areas in Dublin, Meath and Kildare remained severely constrained.

In addition the North-South Interconnector, first proposed in 2006, has been through repeated legal challenges and is now not expected to be energised until 2031. This represents a quarter of a century from conception to operation for 138 kilometres of transmission line.⁹ Construction inflation over delay periods of this length routinely pushes projects beyond the feasibility

⁶More than 628 judicial review cases were taken against An Coimisiún Pleanála (formerly An Bord Pleanála) since 2020, of which 253 were lodged in the 18 months to end-June 2025: <https://www.irishtimes.com/ireland/housing-planning/2025/12/01/legal-fees-to-be-capped-at-41000-in-standard-judicial-review-cases-for-successful-planning-objectors/>.

⁷<https://www.irishtimes.com/ireland/housing-planning/2025/05/14/how-vital-water-project-stalled-for-years-over-minor-paperwork-issue/>.

⁸The estimated cost of the Greater Dublin Drainage project rose from approximately €650 million at application stage in 2018 to €1.3 billion, with the delay attributed in significant part to the judicial review process. The plant had originally been expected to be operational by 2025: <https://www.rte.ie/news/ireland/2025/1205/1547518-dublin-drainage-project/>

⁹EirGrid, Network Delivery Portfolio Q2 2025 (project CP0466): energisation of the North-South 400kV Interconnector is scheduled for October 2031. The planning application was first lodged with An Bord Pleanála in 2009 and, per EirGrid, the project "was fully validated by the courts in both jurisdictions following a number of challenges: [https://cms.eirgrid.ie/sites/default/files/2025-07/Network_Delivery_Portfolio_Publication_Q2_\(2025\).pdf](https://cms.eirgrid.ie/sites/default/files/2025-07/Network_Delivery_Portfolio_Publication_Q2_(2025).pdf).

parameters under which they were approved, which in turn forces reappraisal, refinancing and, in the private sector, abandonment. Such delays highlight the real compounding cost that the State ultimately pays and constitute a significant competitive constraint on the State's attractiveness for investment.

Compounding impacts of the judicial review system

The right to challenge unlawful decisions is a necessary discipline on the planning system, protected by the Aarhus Convention and EU law, and a well-functioning review jurisdiction ultimately improves the quality of first-instance decision-making. Our concern is the length of time that a challenge takes and the compounding effect of additional challenges; not the fact that such challenges can be brought. A judicial review that is determined within months is compatible with infrastructure delivery; one that takes two years, twice over, is decidedly not.

The establishment of the Planning and Environment Court as a division of the High Court in December 2023 was a positive reform, and the fast-tracking of nationally significant infrastructure under Practice Direction HC137 is to be welcomed.¹⁰ Nonetheless, the division operates with only three assigned judges against a caseload that grew by 73% in its first year,¹¹ and routine interlocutory matters are now waiting months for hearing dates simply because judicial time is unavailable. It is arguable that specialisation without capacity merely relocates the queue.

¹⁰The Court was established as a division of the High Court in December 2023 with three assigned judges: <https://courts.ie/organisation-information/about-the-planning-and-environment-court>; Practice Direction HC137 (April 2026) provides for fast-tracking of nationally significant infrastructure projects: <https://courts.ie/practice-directions/full-practice-direction?url=planning-and-environment-court-list>.

¹¹Remarks of Mr Justice Richard Humphreys of the Planning and Environment Court, at the Law Society Environmental and Planning Law Committee annual conference noted a 73% increase in cases in the division, with 247 live cases in early November 2024: <https://www.lawsociety.ie/gazette/top-stories/2024/november/planning-act-effect-on-judicial-review-overstated/>.

Question 2: How can an effective and timely decision-making culture be enhanced within the Irish planning system?

Our recommendations:

1. Increasing the capacity of the Planning and Environment Court should be prioritised.
2. Statutory target timelines should be set for each stage of a planning judicial review - leave (where retained), hearing and judgment - with published performance against them. The two-month judgment target in the current practice direction should become the norm and monitored under the Framework.
3. The judicial review provisions of Part 9 of the Planning and Development Act 2024 should be commenced without delay. Priority should be given to measures that channel challenges to a single, early, comprehensively-pleaded hearing and to remittal of curable errors rather than full re-runs of the consenting process.

Question 3: Suggest appropriate performance indicators to measure and timely effective decision making within the Irish planning system.

The Framework should measure end-to-end consenting time, from application to a final, unchallengeable decision, including appeal and judicial review stages, as its principal timeliness indicator, rather than the statutory period for compliance of any single body.

Timelines on their own do not tell the whole story, though. The rate of decisions overturned on appeal should be tracked, how often and how long further-information requests run, and the time between key stages of the process. Appeal turnaround and enforcement follow-up matter for the same reason.

Question 4: What do you envisage as the key outcomes / benefits of improved effective and timely decision making within the Irish planning system?

The most immediate and clear benefit is reduced uncertainty. Where the planning system operates to known timelines and produces decisions that are consistent with policy, applicants can make financing, procurement and staffing decisions earlier. Ultimately that certainty reduces cost and strengthens confidence in the State's ability to deliver.

Housing supply would benefit directly. CSO figures show a fall of over 21% in residential planning permissions in 2024 compared to 2023, which indicates why faster, more reliable decision-making is important. This would help remove a significant source of risk.

3. Strategic Resourcing and Organisational Culture

Question 1: What would represent excellent strategic resourcing and organisational culture for you in relation to the Irish planning system and its processes?

Excellence means a planning system that is properly staffed and skilled. Reform only succeeds if those implementing it are equipped to do so, with the right mix of planners, technical specialists, legal expertise, and overall capacity to handle cases.

The Ministerial Action Plan on Planning Resources correctly identifies the workforce deficit in planning authorities and An Coimisiún Pleanála.¹² However the Framework’s conception of “the planning system” must extend to every institution on the consenting pathway: prescribed bodies whose late technical input delays decisions, ACP, and - critically - the courts. It is inconsistent to resource the decision-makers while leaving the review stage, where nationally significant projects now spend the largest share of their consenting time, starved of capacity

Question 2: What steps need to be taken to improve strategic resourcing and organisational culture within the Irish planning system?

This requires a long-term approach, sustained investment in workforce planning, recruitment, retention and leadership development across the system.

Our recommendations:

- Resourcing indicators under the Framework should cover the full consenting chain; including vacancy rates and time-to-recruit in planning authorities and the Commission, response times of prescribed bodies, and judicial and registrar capacity in the Planning and Environment Court relative to its caseload.

¹²Department of Housing, Local Government and Heritage, *Ministerial Action Plan on Planning Resources* (October 2024); <https://www.gov.ie/en/department-of-housing-local-government-and-heritage/publications/ministerial-action-plan-on-planning-resources-october-2024/>,

- Retention should be weighted equally with recruitment. Experienced planners, inspectors and specialist staff are being lost to the private sector faster than graduates can replace them; progression paths and specialist career structures matter more than headline recruitment targets.

Question 3: Suggest appropriate performance indicators to measure strategic resourcing and organisational culture within the Irish planning system.

Relevant indicators include:

- vacancy rates for planners and key related specialist posts;
- staff turnover and average length of tenure in planning roles;
- time taken to recruit into approved posts;
- ratio of case volume to professional staff, adjusted for complexity where possible;
- staff participation in continuing professional development and specialist training;
- availability of in-house or shared specialist support in areas such as ecology, transport, or legal;
- stakeholder feedback on consistency, responsiveness and professionalism of engagement; and
- proportion of recurring audit or review findings that are addressed within a defined period.

Question 4: What do you envisage as the key outcomes / benefits of improved strategic resourcing and organisational culture within the Irish planning system?

The main benefit would be confidence that reform can actually be delivered. Good policy stalls without the people and culture to carry it through and better resourcing will reduce bottlenecks

and supports more reliable implementation. More broadly, a better-resourced system is simply more resilient and therefore more competitive which is positive for attracting investment.

4. Citizen Centred service

Question 1: What would represent an excellent citizen centred service for you in relation to the Irish planning system and its processes?

Businesses are citizens of the planning system too. The SME seeking to extend its premises, the town-centre retailer affected by a public realm scheme and the employer whose staff cannot find housing all experience the system's opacity directly. A citizen-centred service is one in which any participant can establish what stage a case is at, what remains open to influence, and when a final decision can be expected.

Early, meaningful engagement also has a direct bearing on the litigation problem. Challenges are more likely where communities feel the substantive arguments were never heard. Front-loading genuine consultation at plan and pre-application stage is cheaper than defending judicial reviews afterwards. However, ensuring this is facilitated and carried out in a timely manner should be prioritised.

Question 2: What steps should be taken to improve citizen centred services within the Irish planning system?

The Framework should require live, plain-language case tracking for all applications, showing current stage, statutory clock position and expected decision date, across planning authorities and the Commission on a common platform.

Timing matters as much as clarity. The framework should encourage earlier consultation at plan stage and clearer explanation of what can still be influenced at the application stage. Doing so would reduce misplaced expectations and improve the quality of participation.

Question 3: Suggest appropriate performance indicators to measure the delivery of citizen centred services within the Irish planning system.

Useful indicators include:

- average response time to public and applicant queries;
- percentage of case files and decisions published within defined timeframes;
- availability of summaries for key planning processes; and
- proportion of users who report that they understood how their submission or observation was addressed.

Question 4: What do you envisage as the key outcomes / benefits of delivering improved citizen centred services within the Irish planning system?

The biggest gain would be that outcomes are more efficient. Clearer information and earlier engagement can prevent avoidable disputes and reduce the number of interactions driven by uncertainty. That would benefit communities and applicants alike.

5. Transparency

Question 1: What would represent excellent practice in terms of transparency for you in relation to the Irish planning system and its processes?

Transparency should extend beyond individual case files to the performance of the system itself. In practical terms, that means clear statements of reasons, complete and timely case information, publication of relevant performance data and a clearer line of sight between plan objectives, infrastructure assumptions and the decisions taken under them.

At present, no single published dataset allows an applicant to view how long the full consenting pathway takes for different categories of development, where the time goes, and how this is trending. What is not measured cannot be managed, and what is not published cannot be held to account.

In addition, businesses need to understand how consistently the system works across places and case types. That is why transparency on performance, appeals, litigation and infrastructure dependencies matters as much as transparency on individual decisions.

Question 2: How can transparency be enhanced within the Irish planning system?

Our recommendations:

1. The Framework should mandate an annual, published “consenting pathway” dataset covering:
 - a. decision times by body and case type;
 - b. appeal rates and durations; the number,
 - c. subject-matter,
 - d. duration and outcome of planning judicial reviews; and
 - e. the infrastructure capacity position (water, wastewater, grid) for each designated growth area.

Question 3: Suggest appropriate performance indicators to measure transparency within the Irish planning system.

Useful indicators would include:

- the percentage of decisions, case documents and appeal outcomes published within defined timeframes;
- the publication frequency and comparability of performance data across authorities and agencies; and
- the number of authorities and agencies publishing standardised dashboards covering timelines, appeals, enforcement and other core metrics.

Question 4: What do you envisage as the key outcomes / benefits of improved transparency within the Irish planning system?

We would expect a stronger and more accountable system that is easier to engage with and better equipped to help businesses plan and invest.