

Symposium: The Role of Planning in Ensuring Housing Supply

The Role of the Planning Process in Ensuring Effective Housing Supply

Niall Cussen¹
Office of the Planning Regulator

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1. INTRODUCTION

This short paper seeks to put the planning process in Ireland in context in relation to the wider process of addressing housing supply, which is a much larger topic.

Meeting Ireland's housing needs through proper planning and sustainable development is a very significant public policy issue. Enabling the right development to take place in the right places and at the right times is the fundamental purpose of planning.

Significant advances have been made in Ireland over the past decade in aligning spatial planning and public capital investment with a more evidence-based and plan-led approach which is key to meeting both housing and wider environmental objectives.

Further planning reforms are in train and in tandem with a continued commitment to linking spatial planning and investment and resourcing the planning process. Additional progress can therefore be anticipated in ensuring Ireland has an agile and effective planning process serving the long-term needs of the citizen.

2. HOUSING DELIVERY: PLANNING AND OTHER INFLUENCES

Ireland's planning process is one of a number of important influences on housing supply. The planning process identifies (zones) developable land and assesses applications (and planning appeals) for development consents (planning permission) enabling the housing sector to deliver. There are other key influences too, including the availability of investment capital and purchasing power of house buyers and renters to fund development, the co-ordination of essential infrastructures that housing cannot be delivered without such as water services, transport, schools and the capacity of the construction sector.

From very high completion numbers in the early 2000's of almost 90,000 homes, the Global Financial Crash (GFC) hugely impacted on housing construction from 2008. By 2013, completions had fallen to just 4,575 homes, well below the level of around 30,000 dwellings that a country of Ireland's size needed at that time.

Construction levels have taken time to recover, increasing notably in recent years. By 2016, completions had nearly doubled to 9,866 homes. By 2018, that had nearly doubled again to 17,908. In 2023, over 30,000 new homes were delivered – almost a third of them social. At the time of writing, the indications are that delivery in 2024 may increase further to a level approaching 35,000 or more dwellings.

As mentioned above, a bank of developable lands and implementable planning permissions are two of the most important inputs of the planning process into the housing supply system. Sustained progress being made on the

¹ This article is dedicated to the memory of Dr Donal O'Neill, former member of SSISI and Professor of Economics of Maynooth University who was both a classmate and friend of the author, but who sadly and prematurely passed away on 10th October 2023. RIP.

supply side has been made possible because of lands identified and zoned in development plans in the past, and planning permissions granted through the planning system.

The level of litigation in the planning process (judicial review of planning decisions by the Courts) has recently increased from historically very low levels, which is being addressed on a number of fronts including the capacity of the Courts and a new Planning and Development Bill. It is also worth noting that the planning system has granted permission for a significant level of housing delivery that has yet to commence for a variety of economic, infrastructural delivery and legal reasons.

3. SUSTAINABLE COMMUNITIES

As the Irish Housing Commission in its report to Government pointed out, housing does not exist in isolation from essential physical and social infrastructure whose co-ordination with the delivery of housing is critical to ensure the development of sustainable communities.

For homes to function effectively and become part of sustainable communities: water services have to function; transport, schools, communications and energy networks have to be provided; and a range of essential social infrastructure such as educational, amenities and cultural facilities are necessary. The co-ordination of all of the above with housing provision is what planning is all about - creating good places for people to live, whatever their financial means or stage of life.

In addition to ensuring the quantum of housing delivered meets the needs of wider society and the economy, getting the right locations where housing is delivered and the right types of housing that society needs are also essential. Get housing location and forms right and housing delivery becomes a foundation for sustainable communities, low carbon development, reductions in energy and travel demand and environmental sustainability. Get the above wrong, as the country witnessed in the lead-up to the GFC, with housing under-delivered in city locations and over-delivered in others – such as the largely tax-incentive driven “ghost estates” of the Upper Shannon Tax Incentive Scheme – and you get urban sprawl, highly energy demanding and private (car-based) transport rather than public transit oriented development. This can give rise to very significant long-term external cost implications in terms of climate and emissions and the public capital programme.

Where housing happens is therefore the key focus for the planning process. As other papers prepared on foot of the Society’s event in April 2024 cover in greater detail, the absolute quantum of housing delivery tends to be much more influenced by the degree of capital available for either or both public and private housing construction and refurbishment. The availability of capital investment by the state in public housing plus the availability of development finance and or mortgage finance, coupled with the physical construction capacity of the economy in terms of labour, are the ultimate determinants of the scale of housing that can be delivered at any one time.

4. ECONOMIC AND FISCAL FACTORS AND PLANNING

Economic and fiscal determinants of housing delivery are also important factors for the planning process to take account of in the setting of planning policies. For example, macro-prudential rules have been in place since the global financial crash in relation to the maximum extent to which households may enter into mortgage debt to acquire housing. Under such rules, the purchasing power of the average household should be a very important factor for planning policies to take on board in relation to additional costs that say a particular planning policy requirement might impose over and above standard or median construction costs. This is particularly the case in relation to more complex forms of construction such as multi-unit or apartment developments that often require lifts and basement car-parking.

At the same time, land and its cost are an important part of building homes. The role of the planning process is therefore particularly central to ensuring that a good supply of serviced development land, whether that be brownfield (previously developed) or greenfield (never built on before) development land is brought forward. Again, either under or over provision will tend to have detrimental impacts. Under-provision creates excessive competition for development land and upward price pressure. Over-provision will create greater public capital costs in over-servicing or preparing land for development and the long-term social and environmental implications of scatter-gun and uncoordinated development where it becomes difficult to deliver sequential and joined up development without gaps in key infrastructures.

The role of the planning process is also central to housing supply in determining applications for planning permission to develop housing, so that a sufficient reserve or bank of planning permissions is capable of being activated by housing providers, be they private, public or voluntary (approved housing body) providers.

5. LEAD-TIMES

The lead times for the delivery of housing are considerable for a number of reasons. These are as follows:

- Acquiring lands earmarked for housing through the development plan process with services sufficient to enable construction and occupation of dwellings upon completion.
- Obtaining both planning permission (which can be subject to appeals and judicial reviews – increasingly so in recent years) but also other consents including fire safety certificates, water and other services connection agreements.
- Arranging for contractors to undertake works, which can be of considerable physical scale, whether homes are being constructed in situ or in an off-site facility.
- Funding the capital cost of such works by arranging development finance; and
- Securing an overall return on the development in question through the process of disposal of completed dwellings through sale or otherwise.

Mindful of the many processes outlined above, it is often remarked in planning and development circles that in the provision of any new dwelling, the steps and processes above can take typically 5 or even up to 10 years before homes are ultimately delivered.

6. MEETING HOUSING AND ENVIRONMENTAL CHALLENGES TOGETHER

Mindful of the timescales for housing delivery, as a highly dynamic and open economy influenced to a great extent by the international economic context, Ireland faces the concurrent challenges of meeting the needs of a fast-growing population (the fastest in the EU) and decreasing household sizes that accelerate housing demand, while delivering a 51% reduction in greenhouse gas emissions by 2030 (and 100% by 2050) and addressing legacies of under-investment in critical infrastructures like water services, transport, energy systems.

Planning is not just central to these challenges; it is the key mechanism to address them. A coherent set of planning legislation and policy and resourcing of its processes are the foundation stones of an effective planning process.

7. SPATIAL PLANNING, INVESTMENT AND OVERSIGHT

While the Planning Act is under review at the time of writing, significant progress has been made in linking spatial planning and capital investment in Ireland, particularly since 2018, when Government published the National Planning Framework (NPF) and National Development Plan (NDP) under the overall brand of Project Ireland 2040. These two crucial public policy documents, launched in Sligo in 2018 with the attendance of the full Cabinet, marked a decisive whole-of-government commitment to strategic visioning and investment.²

An overall development vision is now shared between the NPF and NDP, including 10 national strategic outcomes in relation to environmental and place-based development objectives. The two documents also provide for national development projects, very significant public capital investment (€165bn), a number of specific investment measures such as the Urban and Rural Regeneration and Development Funds (€2bn and €1bn respectively) and major investment in housing under the Housing for All action plan on housing (€4bn capital investment per annum).

This shift towards a plan led process has been further driven not only by domestic considerations such as the Climate Action Plan but also by international and EU obligations and will intensify through reforms of the planning process. Moreover, it is a shift that has also been underscored by the establishment of a new powerful development arm of Government to mobilise the State's land interests in key urban locations as well as wider private investment – the Land Development Agency (LDA) – and the establishment of the Office of the Planning Regulator (OPR) to see that national, regional and local spatial plans are broadly co-ordinated, while allowing for local conditions to be addressed.

In this regard, the OPR's functions are threefold, in relation to:

- ***Independent assessment of the spatial plans*** (development plans, local plans and regional spatial and economic strategies) of the 31 local authorities and 3 Regional Assemblies throughout all stages, including the power to recommend to the Minister for Housing, Local Government and Heritage to direct the relevant authority or assembly to amend plans where there may be significant breaches of planning legislation, national and/or regional policy;

² This is in stark contrast to the early 2000's when the National Spatial Strategy (NSS) came after the National Development Plan 2000 and was further undermined by the Government decentralisation process and ultimately by the drying up of the public capital programme after the global financial crash.

- *Reviews of planning authority systems and procedures* in performing their statutory functions; and
- *Driving education, training and research in planning* and promoting *better public understanding* of the role of the planning process.

It is through the first of the above functions that the role of the OPR comes into contact with the broad housing supply process.³ The OPR plays a key role in overseeing the development and local plan processes and the degree to which they provide for a suitable supply of serviceable land as well as implementable regeneration opportunities in line with the NPF target that 40% of our housing needs be met within the fabric of the cities, towns and villages across the country. The function of the OPR is to ensure that the broad rules applying to development plan preparation are reasonably and fairly applied and that policy makers at local level (the elected councillors) properly address their statutory and policy obligations in addressing local conditions.

The move towards the more co-ordinated approach above learned from historically uncoordinated patterns of development plans of the 88 separate local authorities that existed prior to reorganisation of local government in 2014. That historical legacy of a largely locally driven spatial planning process with little or no coordination regionally or nationally, led to development plans:

- Massively over-providing for zoned land, which made it even more difficult to co-ordinate expensive enabling infrastructure like roads, water services, public transport or schools;
- Locking-in reliance on private car transport as the dominant mode of transport;
- Focusing more on edge than urban core development; and
- Encouraging a development led planning approach, with infrastructure provision – particularly social infrastructure - catching up after.

8. COORDINATION THROUGH PLANNING

Today, development plans and local plans are required to:

- Derive from evidence-based forecasts of national and regional population, housing and employment targets, which inform the quantum and distribution of land that each plan would set as objectives (zoning) for development and delivery over the lifetime of the plan;
- Enable more physically compact (less low-density sprawling) development with a major emphasis on concepts like city and town centre first and the 15 minute neighbourhood;
- Focus on sustainability, net zero carbon and biodiversity centred planning and development; and
- Set an implementable framework for public capital investment where the ask at local level can be broadly matched by the availability of public capital investment whether through direct exchequer investment, the local authority capital programme and the programmes of the semi-state and regulated utility sector – such as Uisce Éireann Irish Water.

In the plan-led system, there are 4 key parts to the spatial planning systems provisioning for housing delivery:

- How much housing - settled through National and Regional population and housing targets of the NPF/RSES;
- What types of housing⁴ - settled through the application at local authority level of a Housing Needs Demand Assessment (HNDA);
- Co-ordination of overall housing delivery (public and market) through the Housing Strategy of the Development Plan; and
- Co-ordination of housing delivery with wider infrastructural investment, environmental and spatial planning objectives (such as achieving compact growth and urban regeneration) through the Core Strategy of the Development Plan.

Ultimately, the development plans of today (and the OPR's assessment of such plans) seek:

- to ensure that the overall pattern (or strategy) of development over the lifetime of a plan is sound from the perspectives of proper planning and sustainable development;

³ While a detailed discussion over the provenance of the OPR is beyond the scope of this article - suffice to say that its establishment was the central recommendation of the Mahon Tribunal which reported in 2012 after 12 years of work in examining allegations of corruption and systemic failures of the planning process, principally in Dublin, to properly and impartially plan for the future.

⁴ In terms of housing tenure and specialist housing needs.

- that the Core Strategy of the development plan can and will be matched by available investment capacity at national level in critical enablers like water and transport and ultimately that;
- a sufficient supply of zoned land is provided, making sure that such lands are ultimately buildable and avoiding an excessive over-provision of lands that could give rise to uncoordinated development or tying up of capital investment to the detriment of other local authority areas.

9. IMPLEMENTATION OF THE PLAN-LED SYSTEM

The process of implementing the more evidence-based plan-making approach has not been without some criticism. For example, there have been frequent media and property sector comments made principally around an apparent contradiction between rationalising land banks of zoned land designated in legacy (pre NPF) development plans that far exceed current population and housing targets at a time of profound need to mobilise an ample supply of development land in accommodating current housing pressures.

Such criticisms do not stack up when examined in detail because all development plans have to provide a degree of over-supply of development land – often referred to as “headroom” – to take account of the reality that not all development land zoned for housing for example will be released over the lifetime of the plan. For example, economic or land ownership factors may militate against there being the conditions to get sites moving forward through the planning and development process.

A good example of this is the development plan for South Dublin County Council adopted in 2022. Under the NPF targets, this authority would need to plan for the delivery of 15,576 homes over the six-year life of the plan to 2028. However, the total capacity of zoned lands in this plan, (not all of which may be developed or could take a longer period than that of the plan to realise), was 42,570 homes.

Excluding these longer term development sites, the more immediately actionable land bank was estimated as being capable of supporting the delivery of 21,490 homes divided between zoned and serviced (lands benefitting from existing water and transport infrastructure mainly) development lands capable of yielding 11,597 homes and zoned and serviceable (needing future investment delivery of mainly water and transport infrastructure over the lifetime of the plan) of 12,133 homes.

The above highlights that it is frequently the servicing of zoned land with essential infrastructures like water services or access that will frequently be the determinant of whether such lands can be developed rather than simply zoning alone.

Notwithstanding the above, the development plan of this authority provides amply for the NPF targets, contrasting with the actual delivery rates in this local authority area being, until recently, likely to achieve only half of the NPF target, mainly due to economic conditions in relation to viability of development rather than an absence of development land or planning permissions.

The OPR’s assessments of statutory development plans find generally similar conditions in most other local authorities where actual delivery is well behind the targets that some commentators say are acting as a barrier or a ceiling on delivery.

A useful interactive tracker of housing completions vs planning targets is published by the Department of Housing, Local Government and Heritage at <https://storymaps.arcgis.com/stories/ab12ed6d50a540e2891170c24955ff49> . It shows that in 2023 for example, in Dublin City Council’s area, the total number of homes delivered was 3,467 compared to a development plan target of 8,195. In contrast, in 2023 there were 2,720 homes completed in Kildare to the west of Dublin City as opposed to a development plan target of 1524.

10. ZONING OF LANDS

Zoning appropriate amounts of land is a balancing act in avoiding either under-provision leading to excessive competition for land and upward price pressure or over-provision to the detriment of a sustainable approach to spatial development and the resourcing of the essential water services, transport, community and social infrastructures that development cannot begin without. Ministerial Guidelines and oversight by the OPR recognise the importance of achieving the above balancing act. Through evidence-based and plan-led approaches, the plan-making process can effectively inform infrastructure providers in the way they prioritise investment in locations earmarked for growth, ensuring efficient use of public money, and that the necessary physical and social infrastructure is available to support new and existing communities.

The calls to zone more land as a ‘common sense’ solution to increasing housing delivery often reflects neither the reality of the extent of land already zoned, nor the complexity of balancing social, environmental and public investment requirements in ensuring the achievement of sustainable communities over the longer term.

11. ACTIVE LAND MANAGEMENT

Another frequent criticism of the evidence-based plan-led approach to land supply now in place is that lands may be zoned or identified for delivery in a development plan, which may indeed be serviced but which due to fragmented or even uncooperative landowners, may not come forward for development over the lifetime of the development plan.

This is certainly a risk with the current system. But, it is one which local authorities are being equipped with significant powers to address starting from the premise that the best located lands are the ones that should be the priority to activate - since such lands typically benefit from the highest availability of essential (and expensive to provide) infrastructure like public transport and water services but also schools, amenities and community facilities.

The tiered approach to zoning of lands promoted in statutory guidelines on the preparation of plans and of the Minister for Housing, Local Government and Heritage now require a detailed location by location audit of infrastructure capacity and a scoping out of the potential for implementable planning permissions on such lands before they are included in the plan.

The guidelines above require local authorities to focus on locations that will likely come forward for development over the plan period commensurate with good locational parameters such as achievement of compact growth, walkable communities and proximity to city and town centres.

The OPR’s assessment of plans very much focuses on these qualitative aspects, taking a pragmatic approach to the wider assessment of the quantum of development land that a given plan may identify. Since established in 2019, the OPR has reviewed 28 city and county development plans, making recommendations for changes to such plans through the Direction process under Section 31 of the Planning Act to change residential zoning on eight development plans. Typically, these concern locations where there are serious qualitative deficiencies in the land use zoning objectives adopted by the relevant Councils where lands are:

- Highly peripheral or non-sequential in relation to the general built-up area of settlements (so called “leapfrogging”); or
- Subject to other profound or development-barring constraints, such as flood risk, non-availability of or inappropriateness of servicing by essential services (water and access typically).

Interestingly, contrasting with the broad extent of the national residentially zoned land bank⁵ the area of land impacted upon by residential zoning directions at the time of writing has been 216 ha. The reasons for such directions are set out in Figure 1 and relate to avoiding egregious breaches of settled national planning policies concerning ensuring compact growth and avoiding non-sequential development (163 ha), failure to ensure appropriate infrastructural enablement (36 ha) and failures to address the presence of serious flood risk (17 ha).

Figure 1: Analysis of Land Area of Residential Zoning Altered by Direction*

Reason	Total hectares (ha)	%
Compact growth/non-sequential	163	75
Infrastructure	36	17
Flooding	17	8
CDP directions total (ha)	216	100

Source: The Residential Zoned Land Tax (RZLT) dataset 2023, Department of Housing, Local Government, and Heritage

* Note all values are approximate

⁵ The Residential Zoned Land Tax (RZLT) dataset published in 2023 by Department of Housing, Local Government, and Heritage, shows **over 50,000 hectares of land** (51,365ha) registered under the new RZLT. This dataset identifies the serviced land in cities, towns and villages which is residentially zoned and ‘vacant or idle’ mixed use land, and in theory is available to be zoned for residential use and serviced. This total number includes residential zones (existing, proposed, new, etc.) and mixed use land, town centres, etc.

Moreover, the recently introduced but not-yet fully activated Residential Zoned Land Tax (RZLT) is intended as a land activation measure for lands that may be zoned and indeed anticipated for development because of its serviced nature or location, but which may not be released or sold to enable development.

At the time of writing, all local authorities have advanced the areas liable to the RZLT tax or levy but liability has been deferred pending ongoing updating of the mapping and the option to move on lands to housing providers.

There are also tools such as land acquisition, compulsorily if needed, that local authorities may apply to unblock key sites, which more authorities are willing to explore with the considerable financial backing from Project Ireland 2040 and their own sources.

In addition, recent analysis by the LDA⁶ highlights 83 blocks of potential development land in and around key urban locations around the State that if brought forward would enable the delivery of at least 67,000 social and affordable homes.

That development plans set out a policy framework that ensures economic viability and environmental sustainability are also key reference points for the independent assessment of plans by the OPR.

Another criticism of the planning process is that it does not always place as much emphasis as it should on how realistic development of brownfield lands or lands required to achieve higher densities might be from a fundability and viability perspective. Recalling the macro-prudential mortgage lending rules and the typical spending power of the average income household, it is vital that development plan policies are mindful of the delivery costs of housing.

12. HOUSING DELIVERY: AFFORDABILITY AND SUSTAINABILITY

Development plan standards – while being robust – always need to be applied taking account of both qualitative and delivery aspects in the context of the significant gap between unit delivery cost and the spending power of the median households – which is about €60/70K at present.

In response, the State has been stepping in with supports to bridge that gap, including subsidising the purchase of the more expensive to develop apartment type developments, through measures such as Help to Buy, Homes First, Croi na Conaithe and Project Tosaigh.

Hand in glove with the biggest social housing construction programme seen in decades, the cumulative effect of these schemes including the development contribution waiver scheme are increasing housing delivery.

However, the affordability gap raises longer-term and more fundamental questions, particularly if economic circumstances change and the resources the State has available to it, become more constrained.

Securing compact growth as the norm rather than the exception is going to depend on closing the affordability gap between total costs of housing delivery of higher density forms of development and the economic means available to average income households who do not qualify for social housing and supports.

This will demand solutions linking planning, land management, housing design and delivery and funding inputs. Technology may help, such as modern methods of construction, producing homes in ways like other complex products that have kept pace with spending power through advancements in mass production and technology.

As mentioned earlier, the NPF requires 40% of all housing to be delivered within existing built up areas. The development of urban brownfield and infill sites and by the re-use of existing buildings - the greenest form of housing delivery – will also be key to meeting key climate objectives. OPR assessments of local authority plans often find that the regeneration and re-use objectives of such plans need more detail to ensure implementation. In addition, OPR reviews of the broad planning functions of local authorities frequently identify improvements needed in relation to their urban regeneration strategies.

Furthermore, in 2023 17% of all housing delivery in the State was in the form of single homes built predominantly in the countryside which are a highly carbon intensive form of development. Taking all of the above into account, securing more compact and brownfield development, particularly on state lands the LDA has identified, clearly needs to be a much more significant focus for progress.

⁶ <https://lda.ie/public-lands/report-on-relevant-lands>

13. ADDRESSING HISTORICAL UNDER-DELIVERY OF HOUSING

A final commentary on the current approach to forecasting land requirements and home construction rates is that it hasn't factored in the accumulated under-provision of homes for some years – otherwise known as the backlog of supply. In this regard, it is important to note that the methodology for establishing housing targets applied by planning authorities in their development plans expressly requires the inclusion of past under-provision in forecasting future housing delivery requirements and associated land requirements.

As a result, development plans already have built-in capacity to deliver c.50,000 homes per annum, if the right economic and delivery conditions can be found to activate development lands.

14. RESOURCING THE PLANNING PROCESS

A common factor that is not given as much prominence in much of the analysis of the planning process is the degree to which it is operating under considerable capacity restrictions due to under-investment in systems (particularly ICT systems) and staff, including specialist skills on the one hand, compounded by a dis-improving revenue position on the other.

Analysis by the OPR in 2022 concluded that of the circa €160m annual cost to local authorities of performing their statutory planning functions, only €30m (17%) is recovered through planning application fees mainly and some other small charges.

Such charges are set by the Minister for Housing, Local Government and Heritage and were last reviewed 23 years ago in 2001 when the planning system was a lot less complex. Making a planning application to a local authority in Ireland for one house costs €65, which bears no relation to the administrative cost of assessing such applications. By comparison, in Northern Ireland the comparative application fee is over €1100 which in that jurisdiction covers approximately 50% of the administrative cost of processing.

It is fair to say that the capacity of the planning system at local authority level particularly has not been provided with the necessary resources for decades. In recent years some central funding has been made available for recruiting specialist staff and on-line planning application systems. However, planning departments typically are the poor relation compared to other capital works sections of local authorities that can often recover a significant proportion of their operational costs from the grant in aid provided by central government for infrastructural investment in roads, housing and other infrastructures.

Mindful of wider funding challenges in local government, reform of planning fees would enable a stronger resource base for plan-making and the many local authority led steps in land activation for housing delivery.

15. SUMMARY AND CONCLUSIONS

In summary, the key elements of the current approach to ensuring the planning system plays its part in the making available of a sufficient reservoir of development land are as follows.

- Evidence-based assessment of housing needs taking account of both spatial and (housing) sectoral factors aligned with investment plans for enabling infrastructure, leading to appropriate zoning of specific development lands.
- Prioritisation in the zoning process of suitably located serviced land or land that will be serviced over the lifetime of the development plan.
- Effective monitoring or progress in the implementation of the development plan over its 6 year period monitoring planning applications and consents, commencements and applying appropriate land activation measures as needed, in particular to ensure regeneration and brownfield targets are achieved.
- Scope to include additional more strategic lands in public transport accessible locations and or lands that will take several iterations of plans to deliver – for example Strategic Development Zones (SDZ's) to meet changing circumstances.

In conclusion, it is very much recognised within the planning process that it has a key role to play in ensuring housing supply along with other key stakeholders including funders, infrastructure providers and the development sector.

Despite some criticisms of the planning process, the facts signal that significant reserves of both development land and planning permissions have accumulated over the years. The oversight function of the OPR has been to focus the development plan zoning process on developable and deliverable lands avoiding lands with little or no prospects of infrastructural enablement over the plan period or beyond or at serious risk of flooding.

The drive towards a more evidence based and plan-led approach to identifying and reserving development land is inexorable. It is a function of both national and international regulatory requirements and indeed a public that expects proper planning and sustainable development rather than speculative and development-led approaches.

The more evidence based, plan-led process is more resource intensive because sophisticated plans need better inputs and skills to prepare them. Therefore, resourcing and funding of the planning process is essential in ensuring it plays its role in the housing supply chain along with other parts of the housing supply chain.

To the degree that there can be debates and questions about the data and assumptions underpinning today's planning process, the recently published review of the National Planning Framework⁷ and its underpinning demographic and econometric forecasts and scenarios published recently by the Economic and Social Research Institute are more evidence that an adaptive and data-driven planning process is the way forward.

The role of the OPR has been to take both a pragmatic and strategic approach to its statutory roles, focusing principally on location, co-ordination and delivery rather than being overly focused on absolute quanta of development land, of which there are considerable reserves in an overall sense.

⁷<https://www.npf.ie/first-revision-of-the-national-planning-framework/#:~:text=Statement%20from%20Government%20in%20relation,revised%20timeline%20for%20the%20process.>