Identifying Opportunities for Efficiencies in the Irish Planning Application Process

An Analysis to Help Unblock Barriers to Housing Delivery

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1. Introduction

The Republic of Ireland is experiencing a sustained housing crisis. To address this, the government has set a national target of building 55,000 new homes every year until at least 2034. It is agreed that planning is a crucial enabler that needs to be improved to help meet this ambition.

Several improvement measures with the aim of transforming planning for the better have been set out and put in place in recent years. These include Delivering Homes, Building Communities: An Action Plan on Housing Supply and Targeting Homelessness in 2025, the Planning and Development Act and the Ministerial Action Plan on Planning Resources in 2024. But there is a fundamental problem: the planning application process, that functions to say whether development can go ahead, is struggling and faces chronic problems that this research has uncovered.

The scale of these problems is substantial. The findings reveal that Further Information (FI) requests now affect up to 90% of housing applications, adding six months to processing timelines and delaying an estimated 33,000 housing units annually. Applicants, including market and social housebuilders and their consultants, are struggling to get the right level and quality of advice and input from decision makers up front on what they need to provide to support good decision making. Meanwhile, mandatory duplicate site visits consume 85 full time equivalent planning positions and cost €5.3 million per year. Digital systems are not designed to meet what the planning system users need and failures create over 10,000 days of avoidable delay (Appendix 1).

These quantifiable costs have broader economic, social and personal impacts. The evidence shows these costs are unnecessary and avoidable and can be addressed, providing there is a willingness to take ownership and tackle the underlying root causes.

1.1 Why This Research Matters

This research examined Ireland’s planning application process from the perspective of those who use it daily to deliver housing. It focused on understanding where improvements could be found and made by speaking to those primary users who navigate the system: housebuilders and planning consultants who make applications for new homes and local planning authority planners who make decisions on them.

It addresses a notable gap in understanding how the planning system is performing in practice and how avoidable inefficiencies are acting as a barrier to housing delivery. The Office of the Planning Regulator (OPR) has published research on individual aspects of the process, online services, pre-application consultation, validation and conditions, but has not published research on the end-to-end user experiences of the planning application process. This work fills that gap. Findings were cross validated against OPR publications, revealing strong alignment where research existed whilst identifying new evidence in previously unstudied areas.

The planning application process can and should be understood as a public service, the thing the public interacts with to get an outcome (Pope, 2024). Public service design theory recognises that effective services are user-focused, simple to navigate, quick to deliver outcomes, transparent and consistent (Downe, 2020; Tarling, 2023; Pope, 2024). When services fragment across organisational boundaries without coordination, users and the wider public bear the cost of failures. This lens, alongside established public administration research, informs the analysis throughout this report. See Appendix 2 for further information on the theoretical framework that underpins this analysis.

1.2 Research Objectives

- To map primary user experience of the planning application process, from end-to-end.
- To identify barriers and delays that can be addressed to deliver faster planning application decisions and support housing delivery.
- To provide actionable, evidence based insights for planning system reform.

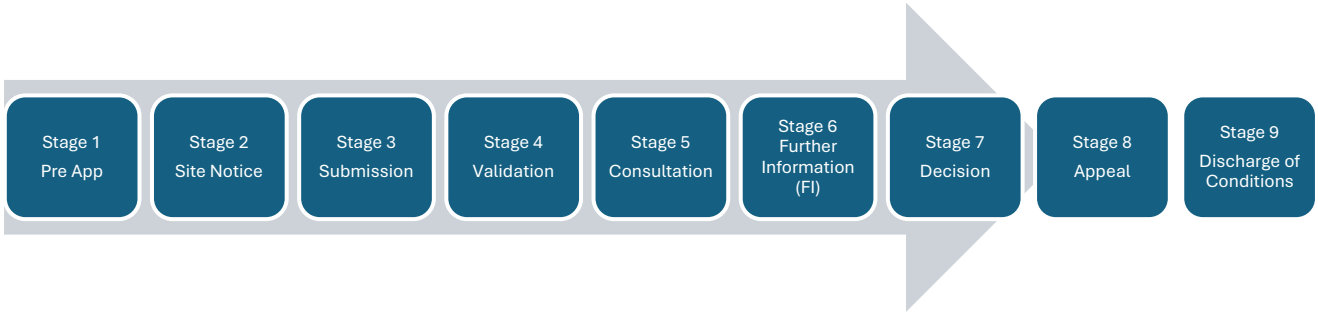
1.3 Methodology

The research began in 2024. It included twelve in-depth user centred research interviews held between autumn 2024 and summer 2025. User centred design theory and methods underpinned the study, reflecting their established role in best practice public service design. This approach enabled a clear understanding of how the planning application process functions for users. User journey mapping, a core method in service design, supported this by revealing end-to-end experiences, breakdowns of pains, opportunities and systemic patterns (Kalbach, 2016; Stickdorn & Schneider, 2011; Stickdorn et al., 2018).

User centred design

This started with the development of a structured user journey map, to represent the process from the users' perspective. Its design was informed by a review of the detailed planning legislation and the more informal citizen facing OPR guidance. The initial design was then iterated following review by a senior service designer and user researcher. This was further tested, iterated and validated by planners from local government. The final user journey map represented the process, as nine sequential stages: what is called the end-to-end user journey.

Figure 1: *User journey map, showing the nine stages of the planning application process.*



Participants described their experiences across these nine stages, from pre-application (Stage 1) through to discharge of conditions (Stage 9). The methodology generated 966 individual responses: 815 stage-specific observations and 151 system-wide insights.

The outputs primarily focus on the process from pre-application through to decision (Stages 1 to 7), which is where the greatest volume of user feedback and evidence of inefficiency was concentrated. Appeals (Stage 8) and discharge of conditions (Stage 9) were covered at a higher level. The normalisation of appeals stands out as an issue that warrants dedicated research. Appendix 6 sets out the areas suggested for further research.

The interviews followed a structured three-step process. Each conversation was guided by the nine stage user journey mapped on a physical research board (Figure 2), with participant feedback captured in real time using Mural (Figure 3) and then transferred to Excel for systematic stage-by-stage analysis.

Figure 2: *Interview board and research script, showing the nine stage user journey mapped.*

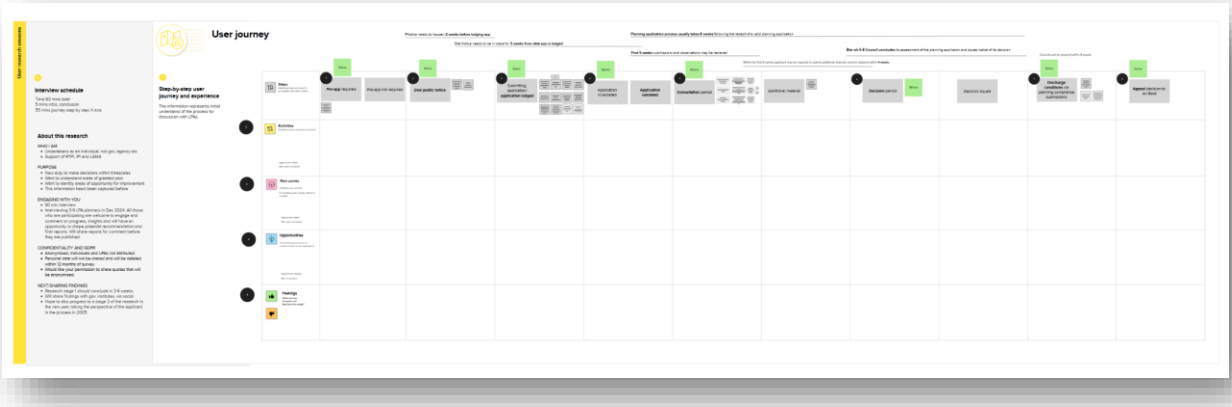


Figure 3: *Using Mural to capture feedback from users at one-to-one interviews*

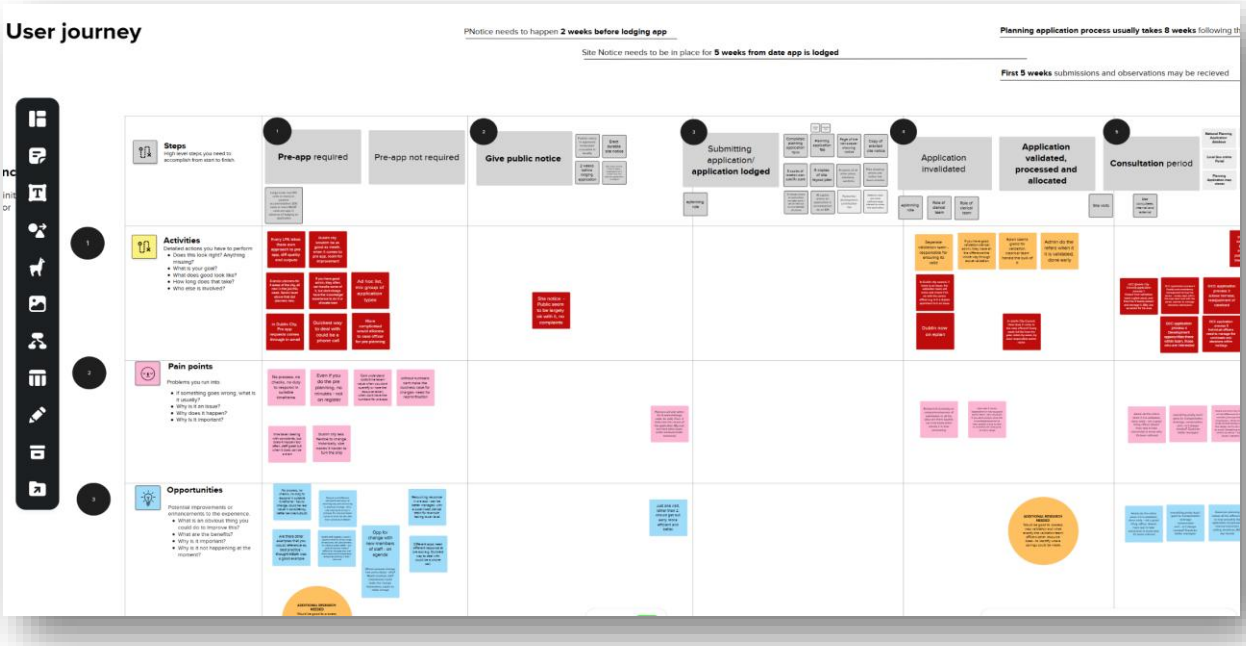
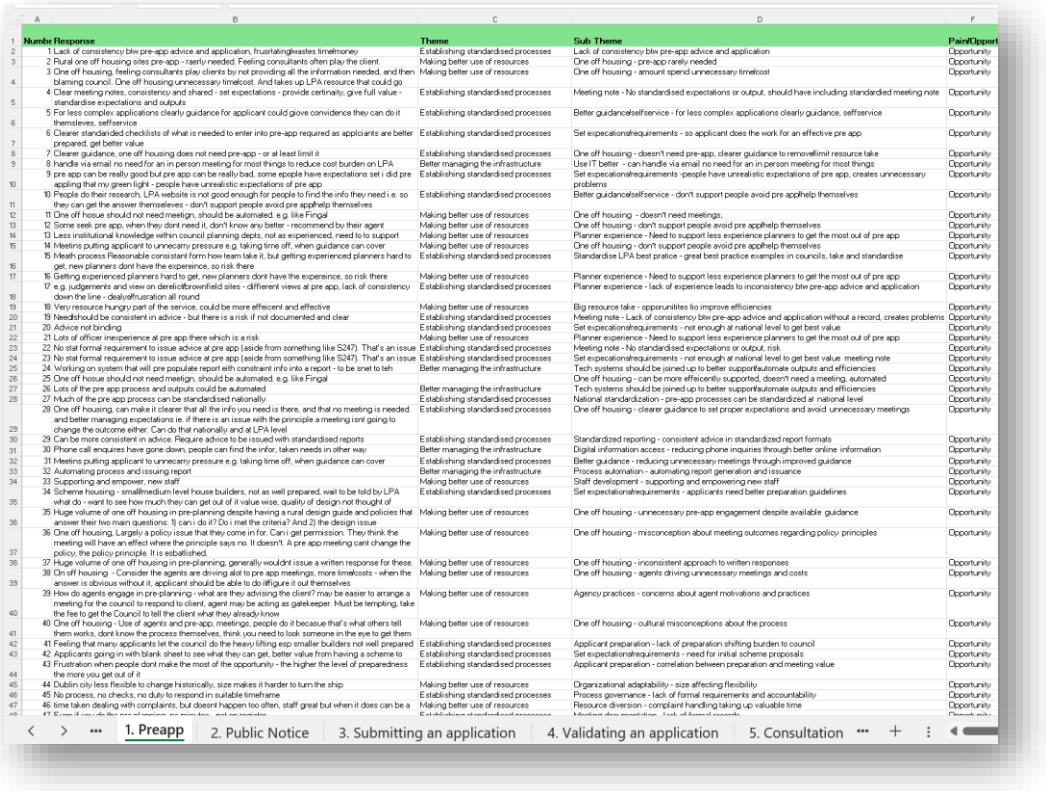


Figure 4: *Data transferred from mural to Excel for analysis*



Numbe	Response	Theme	Sub Theme	Pain/Opport
1	Lack of consistency btw pre-app advice and application, frustratingtwastes timeImoney	Establishing standardised processes	Lack of consistency btw pre-app advice and application	Opportunity
2	Rural one off housing sites pre-app - raerly needed. Feeling consultants often play the client.	Making better use of resources	One off housing - pre-app rarely needed	Opportunity
3	One off housing, feeling consultants play clients by not providing all the information needed, and then blaming council. One off housing unnecessary timelcost. And takes up LPA resource that could go	Making better use of resources	One off housing - amount spend unnecessary timelcost	Opportunity
4	Clear meeting notes, consistency and shared - set expectations - provide certinaity, give full value - standardise expectations and outputs	Establishing standardised processes	Meeting note - No standardised expectations or output, should have including standardied meeting note	Opportunity
5	For less complex applications clearly guidance for applicant could giove convidence they can do it themsleves, selfservice	Establishing standardised processes	Better guidanceIselfservice - for less complex applications clearly guidance, selfservice	Opportunity
6	Clearer standaridied checklists of what is needed to enter into pre-app required as applcaints are better prepared, get better value	Establishing standardised processes	Set expecationsIrequirements - so applicant does the work for an effective pre app	Opportunity
7	Clearer guidance, one off housing does not need pre-app - or at least limit it	Establishing standardised processes	One off housing - doesn't need pre-app, clearer guidance to removellimit resource take	Opportunity
8	handle via email no need for an in person meeting for most things to reduce cost burden on LPA	Better managing the infrastructure	Use IT better - can handle via email no need for an in person meeting for most things	Opportunity
9	pre app can be really good but pre app can be really bad, some epople have expectations set i did pre appling that my green light - people have unrealistic expectations of pre app	Establishing standardised processes	Set expecationsIrequirements -people have unrealistic expectations of pre app, creates unnecessary problems	Opportunity
10	People do their research, LPA website is not good enough for people to find the info they need i.e. so they can get the answer themseleves - don't support people avoid pre apphelp themselves	Establishing standardised processes	Better guidanceIselfservice - don't support people avoid pre apphelp themselves	Opportunity
11	One off house should not need meetign, should be automated. e.g. like Fingal	Making better use of resources	One off housing - doesn't need meetings,	Opportunity
12	Some seek pre app, when they dont need it, don't know any better - recommend by their agent	Making better use of resources	One off housing - don't support people avoid pre apphelp themselves	Opportunity
13	Less institutional knowledge within council planning depts, not as experienced, need to to support	Making better use of resources	Planner experience - Need to support less experience planners to get the most out of pre app	Opportunity
14	Meetins putting applicant to unnecarry pressure e.g. taking time off, when guidance can cover	Making better use of resources	One off housing - don't support people avoid pre apphelp themselves	Opportunity
15	Health process Reasonable consistant form how team take it, but getting experienced planners hard to get, new planners dont have the experience, so risk there	Establishing standardised processes	Standardise LPA best pratice - great best practice examples in councils, take and standardise	Opportunity
16	Getting experienced planners hard to get, new planners dont have the experience, so risk there	Making better use of resources	Planner experience - Need to support less experience planners to get the most out of pre app	Opportunity
17	e.g. judgements and view on derelict/brownfield sites - different views at pre app, lack of consistency down the line - dealsyfrustration all round	Establishing standardised processes	Planner experience - lack of experience leads to inconsistency btw pre-app advice and application	Opportunity
18	Very resource hungry part of the service, could be more efficient and effective	Making better use of resources	Big resource take - opporunilites tio improve efficiencies	Opportunity
19	Needlshould be consistent in advice - but there is a risk if not documented and clear	Establishing standardised processes	Meeting note - Lack of consistency btw pre-app advice and application without a record, creates problems	Opportunity
20	Advice not binding	Establishing standardised processes	Set expecationsIrequirements - not enough at national level to get best value	Opportunity
21	Lots of officer inexperience at pre app there which is a risk	Making better use of resources	Planner experience - Need to support less experience planners to get the most out of pre app	Opportunity
22	No stat formal requirement to issue advice at pre app (aside from something like S247). That's an issue	Establishing standardised processes	Meeting note - No standardised expectations or output, risk	Opportunity
23	No stat formal requirement to issue advice at pre app (aside from something like S247). That's an issue	Establishing standardised processes	Set expecationsIrequirements - not enough at national level to get best value meeting note	Opportunity
24	Working on system that will pre populate report eith constraint info into a report - to be snet to teh	Better managing the infrastructure	Tech systems should be joined up to better supportlautomate outputs and efficiencies	Opportunity
25	One off house should not need meetign, should be automated. e.g. like Fingal		One off housing - can be more effeicently supported, doesn't need a meeting, automated	Opportunity
26	Lots of the pre app process and outputs could be automated	Better managing the infrastructure	Tech systems should be joined up to better supportlautomate outputs and efficiencies	Opportunity
27	Much of the pre app process can be standardised nationally	Establishing standardised processes	National standardization - pre-app processes can be standardized at national level	Opportunity
28	One off housing, can make it clearer that all the info you need is there, and that no meeting is needed. and better managing expectations ie. if there is an issue with the principle a meeting isnt going to change the outcome either. Can do that nationally and at LPA level	Establishing standardised processes	One off housing - clearer guidance to set proper expectations and avoid unnecessary meetings	Opportunity
29	Can be more consistent in advice. Require advice to be issued with standardised reports	Establishing standardised processes	Standardized reporting - consistent advice in standardized report formats	Opportunity
30	Phone call enquires have gone down, people can find the infor, taken needs in other way	Better managing the infrastructure	Digital information access - reducing phone inquiries through better online information	Opportunity
31	Meetins putting applicant to unnecarry pressure e.g. taking time off, when guidance can cover	Establishing standardised processes	Better guidance - reducing unnecessary meetings through improved guidance	Opportunity
32	Automating process and issuing report	Better managing the infrastructure	Process automation - automating report generation and issuance	Opportunity
33	Supporting and empower, new staff	Making better use of resources	Staff development - supporting and empowering new staff	Opportunity
34	Scheme housing - smallImedium level house builders, not as well prepared, wait to be told by LPA what do - want to see how much they can get out of it value wise, quality of design not thought of	Establishing standardised processes	Set expectationsIrequirements - applicants need better preparation guidelines	Opportunity
35	Huge volume of one off housing in pre-planning despite having a rural design guide and policies that answer their two main questions: 1) can i do it? Do i met the criteria? And 2) the design issue	Making better use of resources	One off housing - unnecessary pre-app engagement despite available guidance	Opportunity
36	One off housing, Largely a policy issue that they come in for. Can i get permission. They think the meeting will have an effect where the principle says no. It doesn't. A pre app meeting cant change the policy, the policy principle. It is esbatlished.	Making better use of resources	One off housing - misconception about meeting outcomes regarding policy principles	Opportunity
37	Huge volume of one off housing in pre-planning, generally wouldnt issue a written response for these	Making better use of resources	One off housing - inconsistent approach to written responses	Opportunity
38	On off housing - Consider the agents are driving alot to pre app meetings, more timelcosts - when the answer is obvious without it, applicant should be able to do itlfigure it out themselves	Making better use of resources	One off housing - agents driving unnecessary meetings and costs	Opportunity
39	How do agents engage in pre-planning - what are they advising the client? may be easier to arrange a meeting for the council to respond to client, agent may be acting as gatekeeper. Must be tempting, take the fee to get the Council to tell the client what they already know	Making better use of resources	Agency practices - concerns about agent motivations and practices	Opportunity
40	One off housing - Use of agents and pre-app, meetings, people do it becasue that's what others tell them works, dont know the process themselves, think you need to look someone in the eye to get them	Making better use of resources	One off housing - cultural misconceptions about the process	Opportunity
41	Feeling that many applicants let the council do the heavy lifting esp smaller builders not well prepared	Establishing standardised processes	Applicant preparation - lack of preparation shifting burden to council	Opportunity
42	Applicants going in with blank sheet to see what they can get, better value from having a scheme to	Establishing standardised processes	Set expectationsIrequirements - need for initial scheme proposals	Opportunity
43	Frustration when people dont make the most of the opportunity - the higher the level of preparedness the more you get out of it	Establishing standardised processes	Applicant preparation - correlation between preparation and meeting value	Opportunity
44	Dublin city less flexible to change historically, size makes it harder to turn the ship	Making better use of resources	Organizational adaptability - size affecting flexibility	Opportunity
45	No process, no checks, no duty to respond in suitable timeframe	Establishing standardised processes	Process governance - lack of formal requirements and accountability	Opportunity
46	time taken dealing with complaints, but doesnt happen too often, staff great but when it does can be a	Making better use of resources	Resource diversion - complaint handling taking up valuable time	Opportunity

1. Preapp | 2. Public Notice | 3. Submitting an application | 4. Validating an application | 5. Consultation

Participants

Twelve in-depth interviews were conducted across four user groups: four local authority planners, four housebuilders, two planning consultants and two government bodies.

Four local planning authorities were selected ensuring a representative mix of urban and rural authorities and councils recognised for best practice alongside those experiencing operational challenges, achieving 13% coverage of Ireland's 31 planning authorities. Private sector representation included large planning consultancies with nationwide experience, housebuilders ranging from major to small to medium sized builders and social housing providers.

The research achieved consensus across user groups, with planning officers, consultants and housebuilders independently describing similar problems using comparable language. Responses were analysed through stage-by-stage classification, cross-stage pattern recognition and root cause analysis to identify structural, behavioural and operational origins. Findings were systematically cross validated against OPR publications (CSP02, CSP04, CSP06, PN03), revealing strong alignment where existing research existed and identifying new evidence in previously unstudied areas of the process.

2. Problems

The work captured problems experienced by users at each of the nine stages in the planning application process. In total, 815 stage specific responses were received, with remarkable consensus across user groups. Within each stage, problems are presented in descending order, starting with the most frequently reported across the user groups.

2.1 Stage-by-Stage Problems

Stage 1: Pre-Application

The pre-application stage involves initial consultation between prospective applicants and planning authorities before formal submission. It is largely voluntary though required for major housing applications. Users consider it critical to helping progress an application smoothly through the rest of the process.

This stage generated the most user feedback with 269 responses. In all, 13 distinct problem clusters emerged. Overall, there was user consensus that pre-application is not working as it should or fulfilling its potential to frontload issues, prevent resource waste and later delays. Participants highlighted that a disproportionate share of resources is consumed by low-value tasks, such as routine householder and one-off housing applications. Consequently, complex developments that depend on early, high quality engagement do not receive the necessary level of service.

Table 1: Stage 1 Pre-Application — Problem Summary

Problem	Description	Impact
Poor quality engagement	Pre-application failures directly trigger Further Information (FI) requests adding six months. Users report not getting the value from pre-app.	90% of housing applications receive FI requests
Risk-averse advice	Councils provide generic guidance, keeping records very vanilla. Officers avoid being perceived as having made a decision.	Applicants left without actionable advice
Resource misallocation	Experienced planners spend time on routine applications that could be handled through guidance.	Resource consumed on low-value activity
Response delays	Pre-application responses can take months. Users report waiting three months despite constant chasing.	Projects delayed before they begin
Specialist coordination gaps	Critical expertise is often absent from meetings, particularly outside Dublin. Users report parks, ecology and conservation not present.	Predictable problems missed early
Resource and staffing shortages	Fundamental capacity constraints undermine service quality. Getting	Service quality at risk

	experienced planners is hard and new planners lack the experience.	
Inconsistency across councils	Each council operates different processes. Consultancies create bespoke templates to understand what each authority requires.	31 different processes to navigate
Digital system problems	Multiple portals and frequent technical failures disrupt pre-application processes. Each council has its own portal, each different.	Time lost on technical issues, not planning
Regulatory framework gaps	No statutory formal requirement to issue advice at pre-application creates uncertainty and risk.	No guarantee of written response
Policy inflexibility	Rigid interpretation of policies blocks viable developments even where flexibility exists elsewhere in plans.	Development blocked unnecessarily
Communication and documentation issues	Poor record-keeping and lengthy meetings create interpretation risks and inefficiencies.	Risk of misinterpreting feedback
Measurement and quantification gaps	Without tracking resources, councils cannot understand or improve service efficiency.	No evidence base for improvement
Continuity issues	Officer changes between pre-application and assessment stages introduce new or revised opinions that undermine what was previously agreed.	New issues introduced mid-process

Stage 2: Public Notice

This stage requires applicants to advertise their proposals through newspaper notices and site notices before submission. Planning officers conduct site visits to confirm placement. Users identified six problems focused on resource waste and outdated requirements.

Table 2: Stage 2 Public Notice — Problem Summary

Problem	Description	Impact
Duplicate site visits	Officers visit every site twice: once for site notice verification and once for assessment. All user groups agree this is not a good use of resource.	50,452 visits annually; 85 full time equivalent (FTE) consumed; €5.3m cost
Newspaper notice ineffectiveness	Users question the value of newspaper notices, noting most people access information online.	Cost and time with limited reach
Standardisation issues	Each council requires different site notice formats. Consultancies maintain bespoke templates for each authority.	Duplication of effort across 31 authorities

Security and accessibility challenges	Site notices face vandalism and removal. Enhanced security measures at some sites restrict officer access.	Notices not achieving their purpose
Modernisation and efficiency gaps	System inflexibility creates discrepancies when applications evolve. Newspaper and site notice descriptions can fall out of alignment.	Process not keeping pace with practice
Notification and engagement problems	Current requirements fail to ensure affected parties know about applications, even those directly adjacent.	People learn about applications too late

Stage 3: Submission

This stage concerns the formal lodging of applications with planning authorities through the ePlanning digital portal. Digital frustrations and unnecessary waste dominated users' feedback, with three critical problems all relating to ePlanning functionality.

Table 3: Stage 3 Submission — Problem Summary

Problem	Description	Impact
Document uploading failures	The upload process causes severe operational distress. Users report it takes a full day and requires multiple people.	Estimated 10,000+ days of avoidable delay annually
Inconsistent requirements	Councils impose varying submission requirements. Some reject digital submissions entirely for larger applications.	Unnecessary variation and invalidation risk
System performance issues	Technical failures compound frustration with minimal support available. When problems arise can only refer to a PDF of FAQs.	Delays at the point of entry

Stage 4: Validation

At this stage planning authorities check submitted applications for completeness and compliance with statutory requirements. Validated applications trigger the statutory eight-week determination period. Users highlighted dramatic performance variation from one authority to another, with five problems focused on standardisation and automation.

Table 4: Stage 4 Validation — Problem Summary

Problem	Description	Impact
Invalidation for minor issues	Applications frequently invalidated for administrative issues rather than substantive problems, such as incorrect titles or accidental document duplication.	Financial burden through refund and repayment cycles

Cost and time implications	Invalid applications create financial burdens through inefficient payment processing. Councils refund and applicants must repay rather than holding applications.	Unnecessary cost and delay for minor errors
Manual process burdens	Digital systems still require extensive manual workarounds. Clerical teams download and re-enter data between ePlanning and back-office systems.	Efficiency gains from digitalisation not realised
Document management and system integration challenges	Poor system design makes finding documents unnecessarily difficult within ePlanning.	Officer time wasted navigating systems
Standardisation problems	Councils apply different validation standards for identical requirements. Some require blue lines, others do not.	Inconsistent outcomes for the same application type

Stage 5: Consultation

Here the local authority seeks specialist input from internal departments and external agencies and manages public consultation on the application. Users identified four problems around dependencies and deadlines and the stress it places on individuals.

Table 5: Stage 5 Consultation — Problem Summary

Problem	Description	Impact
External dependencies and deadline pressure	Case officers manage impossible workloads chasing responses from colleagues. Critical responses sometimes arrive only on the day the decision is due.	Delays and stress on officers
Manual processing bottlenecks	Redaction of public submissions requires checking for inflammatory content, consuming time on non-planning tasks.	Professional time on administrative work
System technology failures	Technical problems delay public participation. Submissions were still being added to the system two weeks afterwards.	Public engagement undermined
Public participation barriers	The €20 fee for public submissions creates a participation barrier, limiting engagement primarily to those motivated to object and reducing broader representation in the process.	Skewed participation

Stage 6: Further Information (FI)

At this stage, the case officer can identify if there is an information gap and makes a Further Information (FI) request to the applicant for additional documentation or clarification. Users, in particular planning applicants, identified this as one of the most problematic and

unnecessarily wasteful stages, with six problems and strong consensus across all users that FI requests have shifted from an exceptional procedure to standard practice.

Table 6: Stage 6 Further Information — Problem Summary

Problem	Description	Impact
Normalisation of FI requests	FI requests now affect up to 90% of housing applications. Users plan an additional six months into every programme.	What should be exceptional has become routine
Heavy dependence on specialist expertise	Officers cannot progress without specialist input that is often unavailable, including drainage, transport and conservation.	Bottleneck at a critical stage
Substantial time and financial impacts	FI requests routinely add six months to processing. The development sector now budgets for this delay as standard.	Statutory 8-week process becomes 8+ months
Multiple FI rounds	Some applications face repeated FI cycles, each adding further months.	Cumulative process degradation
Inconsistent handling	Different authorities manage FI requests differently, creating unpredictability for applicants.	No consistent user experience
External statutory consultee engagement failures	Key agencies refuse early engagement, guaranteeing later problems. Transport Infrastructure Ireland (TII) will not engage in pre-planning.	Predictable problems not prevented

Stage 7: Decision

Planning officers finalise their determinations in report form within statutory deadlines and secure appropriate approvals. Users reported intense pressure on individual officers working within the tight eight-week statutory deadline, with little margin for error and heavy dependence on colleagues and systems that do not always deliver. Users identified five distinct problems.

Table 7: Stage 7 Decision — Problem Summary

Problem	Description	Impact
Resource-intensive multi-step approval processes	Officers face intense pressure managing multiple requirements within tight deadlines, with reports due to senior management by week seven.	High pressure with little margin
Administrative and time management pressures	The statutory timeline leaves no margin for error. Officers need reports completed by week eight.	Decisions rushed or delayed

Expert coordination failures	Internal systems fail to facilitate necessary collaboration. Officers struggle to get timely responses through back-office systems.	Decisions delayed or made without full information
Inconsistent conditions	Inconsistent decision making approaches persist across authorities, particularly in condition wording.	Interpretation problems downstream
Dependency on An Coimisiún Pleanála	Paper-based processes with the appeals body create vulnerabilities. Files can get lost.	Vulnerabilities in the system

Stage 8: Appeals

Unsuccessful applicants or objectors challenge planning decisions through An Coimisiún Pleanála at this stage. Overall, users identified five problems. There was consensus across users that appeals have shifted from exceptional to routine. Although fewer users commented on this stage, the feedback indicates that appeals present significant scale and complexity challenges that materially affect the ability to secure timely development decisions.

Table 8: Stage 8 Appeals — Problem Summary

Problem	Description	Impact
Capacity constraints	An Coimisiún Pleanála lacks capacity for current volumes. Users report waiting over a year for some decisions.	16 weeks to 6+ months added
Increasing volume and strategic obstruction	Appeals normalised for all significant developments. Users factor appeal timelines into every major project.	Eight-week process extends to 12 to 18 months
Paper-based processes	First-party appeals must be posted, at odds with digital ambitions.	Anachronistic and slow
Judicial Review (JR) process	JR timelines create years of uncertainty, with cases taking two to three years.	Long-term project viability at risk
Cost and reputational implications	System manipulation undermines public trust.	Confidence in the process eroded

Stage 9: Discharge of Conditions

Applicants need to satisfy any ‘conditions’, which are a type of requirements attached to planning permissions, before development can commence or be occupied. The applicant submits condition compliance documentation whilst the local authority assesses technical submissions. Users identified six problems centred on tracking and coordination failures. Poor systems integration and limited transparency make this stage ad hoc and unclear, with conditions easily lost amid growing complexity and insufficient specialist capacity.

Table 9: Stage 9 Discharge of Conditions — Problem Summary		
Problem	**Description**	**Impact**
Digital infrastructure gaps	System integration failures mean conditions can get lost. Management is described as ad hoc and unclear.	Missed deadlines and confusion
Lack of transparency	External parties cannot track progress or status effectively.	Applicants unable to plan
Resource and training gaps	Increasing complexity with conservation buildings and brownfield sites requires specialist expertise that is unavailable.	Growing workload without capacity
Infrastructure blockers	Infrastructure capacity blocks development activation. Housebuilders cannot resolve infrastructure constraints alone.	Permissions granted but development stalled
Condition quality	Poorly drafted conditions, particularly from appeals, create implementation problems. Conditions can be very badly worded.	Delays in commencing development
Application quality cascade	Poor initial submissions cascade into complex conditions. FI delays result in more conditions being applied.	Problems from early stages compound here

Beyond the Nine Stages

In addition to stage-specific problems, users identified three distinct problems that affect housing delivery after planning permission is granted. They are:

- **Infrastructure delivery shortfall.** Even where pre-planning engagement with infrastructure providers is described as excellent, post-planning waits of 14 weeks for agreements and months for basic responses block development activation.
- **Disconnects between agencies and local authorities.** Different actors within the planning process operate in an isolated way rather than joined up and coordinated. Developers often hold better knowledge of infrastructure constraints than the councils making application decisions.
- **Policy implementation gaps.** National housing targets conflict with local implementation realities, with users reporting that conservative and out-of-date housing policy targets enable some authorities to refuse permissions for housing, even on reasonable sites. Pragmatism and common-sense solutions are frequently hindered by local opposition to development and a highly cautious planning culture.

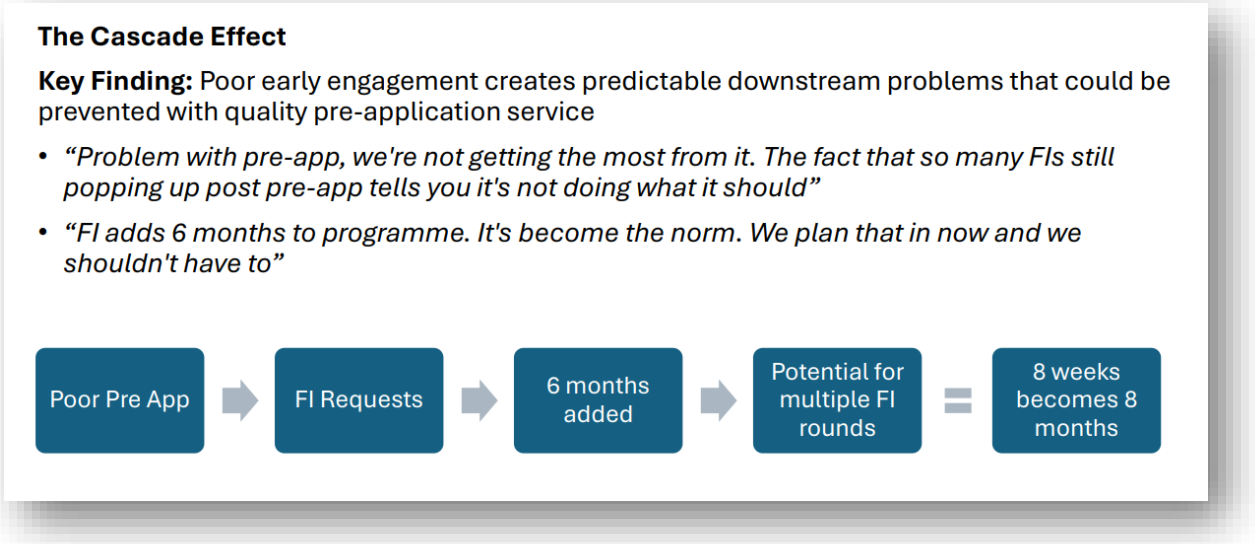
2.2 Problems that Interlink, Cascade and Multiply

The problems above represent more than a list of recurring problems. What emerged was how inefficiencies at early stages cascade and multiply through later stages, compounding their impact including delays to decisions.

This is most clearly demonstrated through the pre-application failure cascade. When a council provides limited or no written pre-application response, predictable problems emerge

at submission that trigger FI requests at Stage 6, adding six months. The delayed application may then be appealed at Stage 8, adding a further 16 weeks or more. The result: applications that should conclude within the statutory eight-week period instead take 12 to 18 months. Figure 5 illustrates how this cascade operates.

Figure 5: *How problems at early stages cascade and multiply through the process.*



This primary cascade is compounded by other inefficiencies. Resource consumed by duplicate site visits reduces capacity for quality pre-application engagement. Each council's independent attempts to improve create further variation for users. Digital systems that reproduce existing fragmentation add new layers of burden. These compounding effects explain why isolated improvements at individual stages have repeatedly failed to make lasting change.

2.3 The Problem Cost

The study determined the approximate costs of specific problems reported, where reliable data exists. These are summarised in Table 10 with further detail set out in Appendix 1.

Table 10: Quantified Impacts of Planning System Inefficiencies

Measure	Impact
FI request rate for housing applications	Up to 90% affected (user-reported)
Duplicate site visit cost	€5.3 million annually; 85 FTE positions consumed
Saving from moving to a single site visit	€2.6 million annually; 42.5 FTE positions freed
Digital system administrative delays	Over 10,000 days of avoidable delay annually
Not clear where limited local authority capacity is going	55% of applications deliver 12% of housing, not clear how much resource they are taking

These figures represent only the directly quantifiable costs. The broader economic impact will be greater. Housebuilders and developers face the most direct financial impact. They budget six months beyond statutory timelines as standard practice and carry significant additional finance charges. The majority now plan additional time for FI requests and the majority are factoring appeals into every project timeline, assuming systemic failure rather than efficient service. Housebuilders also reported that the cost arising from these delays can undermine the viability of development and are ultimately passed on to homebuyers.

Planning consultancies absorb considerable administrative burden and costs, which fall on their clients. They create and maintain bespoke sets of templates for each of the 31 local authorities, train staff to maintain these and respond to evolving local variations and spend days uploading documents through failing digital systems. Much of the expertise that could instead support design and outcome quality is diverted into managing administrative complexity. As a result, applicants are increasingly stepping in to fill gaps in public service provision with their own improvised processes.

Local planning authority officers struggle under impossible pressures. They conduct what they consider to be unnecessary duplicate site visits whilst facing staffing shortages, chase internal colleagues for responses whilst managing 80+ cases and race against eight-week deadlines knowing that meeting them depends on colleagues who are similarly constrained. The stress the system is placing on the individuals involved was palpable. Government and its agencies pay the price too. Investment in legislation, policies, systems and services appears to be reproducing rather than resolving fragmentation, established oversight bodies can see problems and solutions but lack implementation authority and all involved watch housing targets slip further from reach despite repeated reform attempts.

Meanwhile citizens are frustrated that affordable homes appear out of reach and government promises to address the crisis do not appear to change anything on the ground. No one wins. The cost and failure burden falls on everyone.

User Voices: The Problems Today

A sample of what users said about the pains in the planning application process.

On pre-application and frontloading

> *"Problem with pre-app, we're not getting the most from it. The fact that so many FIs still popping up post pre-app tells you it's not doing what it should."*
> — Housebuilder

> *"Council keep a record, very vanilla, officers don't want it to be perceived that they have made a decision, even where they have strong views."*
> — Planning Consultant

> *"I've waited for 3 months just to hear back from the Council on a pre-app request, even though I was constantly chasing."*
> — Planning Consultant

On Further Information becoming the norm

> *"It's unusual for an application not to have FI now. It's become the norm and it really shouldn't be. It should be the exception."*
> — Planning Consultant

> *"FI adds 6 months to programme. It's become the norm. We plan that in now and we shouldn't have to."*
> — Housebuilder

> *"I would say easily 90% of applications for housing have FI requests."*
> — Housebuilder

On resources and pressure

> *"We've 8 weeks. If we don't meet it then we're done. So, we make it work. It puts lots of responsibility on individuals."*
> — Local Authority Planner

> *"Getting experienced planners is hard, new planners don't have the experience, so there's a risk."*
> — Local Authority Planner

> *"The case officer has to do a lot of chasing internal colleagues to get a response. It's stressful because you know they are struggling under the workload as well but you have to do it. It's one more job and one that you have little control over."*
> — Local Authority Planner

On the need for change

> *"Everyone wants improvement, no one has authority to deliver it."*
> — Government Body

User Voices: The Problems Today continued

On inconsistency across 31 authorities

> *"Different for every LPA. Time consuming, figuring out how it works."*
> — Planning Consultant

> *"As a planning consultancy, we've made our own template bespoke for each authority for site notice because a lot of them want their own version of it."*
> — Planning Consultant

> *"The Councils have their own portal, each different. When glitches happen, which is a lot, you need to contact their IT."*
> — Planning Consultant

> *"Outside of Dublin it's not the same quality or level of expertise at the meeting. You won't have parks, ecology or conservation."*
> — Housebuilder

> *"That Council don't accept anything online for anything over 30 units, you have to print it off and post."*
> — Planning Consultant

On digital systems

> *"Document uploading on ePlanning is so painful. I have actually wanted to cry."*
> — Planning Consultant

> *"The clerical team still seem to have to do lots of manual things with ePlanning, like downloading and bringing to council side."*
> — Local Authority Planner

> *On reasons for invalidation: "Sometimes it's things you could have easily sorted with the applicant, like they've forgotten something or mislabelled something."*
> — Planning Consultant

On appeals and conditions

> *"Most applications we do are appealed now so that adds anything from 16 weeks to 6 months automatically."*
> — Housebuilder

> *"At the moment because of the lack of systems integration, conditions can get lost."*
> — Local Authority Planner

> *"The whole pay me €500 and I won't appeal thing. Hopefully that's gone now. But it hasn't done people's faith in the system overall any good."*
> — Housebuilder

3. Opportunities

When interviewed, users were asked for opportunities for improvements, alongside problems for each of the nine application stages. Overall, it was notable how users aligned and how numerous their suggestions were, demonstrating the value of their experience-based insight and knowledge.

3.1 Stage-by-Stage Opportunities

Stage 1: Pre-Application

The pre-application stage generated the most user feedback overall. Users identified seven opportunities that focused on standardisation, tiered services and early engagement.

Table 11: Stage 1: Pre-Application — Opportunity Summary

Opportunity	Description
Standardise pre-application processes nationally	National standardisation offers significant time and cost savings across all authorities.
Remove drain of routine applications from pre-application services	Removing and/or significantly reducing one-off housing and householder extensions from pre-application services (e.g. meetings) would free planning officer capacity for complex developments.
Implement tiered service delivery	Better deploy planning expertise where it adds most value, with supervised clerical teams handling lower-level activity.
Transform into constructive engagement	Shift from defensive checkpoint to constructive problem-solving. Where councils invest in quality engagement, users reported significantly better outcomes.
Standardise nationally and mandate written feedback	Standardised minute templates and mandatory written records would remove interpretation risks and provide accountability.
Integrate digital systems	A unified digital platform covering pre-application would remove manual workarounds and improve transparency.
Require specialist participation	Mandatory specialist attendance and/or input at relevant pre-application meetings would prevent predictable downstream problems.

Stage 2: Public Notice

Users identified three opportunities focused on eliminating resource waste and modernising notification.

Table 12: Stage 2: Public Notice — Opportunity Summary

Opportunity	Description

Consolidate to single site visit	One visit by the planning case officer rather than two would be more efficient and free significant resource.
Standardise site notice templates nationally	National templates would remove current confusion and the need for bespoke templates per authority.
Modernise notification methods	Digital notification approaches, such as automatic neighbour mail out notification and use of Quick Response (QR) codes like in the UK and notification functionality similar to RIP.ie's email alerts, could improve public awareness.

Stage 3: Submission

Users identified three opportunities, all relating to ePlanning functionality and standardisation.

Table 13: Stage 3: Submission — Opportunity Summary

Opportunity	Description
Fix document uploading as a quick win	Enable batch upload capability and progress saving would address the most reported frustration.
Standardise submission requirements nationally	National consistency and clarity regarding submission requirements would eliminate the current variation from council to council and remove reported frustration and lack of transparency.
Improve upload titles, description and referencing	Better document referencing and search functionality would reduce time spent navigating the system and help reduce uploading errors.

Stage 4: Validation

Users identified three opportunities focused on automation, knowledge-sharing and standardisation.

Table 14: Stage 4: Validation — Opportunity Summary

Opportunity	Description
Introduce AI and automation for validation	Automation tools could transform validation efficiency, replacing manual processes that remain admin heavy.
Leverage clerical team knowledge	Significant practice knowledge exists within clerical teams that could be shared and scaled across authorities.
Standardise validation rules, with a limited grace period for minor errors	National standards with reasonable flexibility would reduce unnecessary invalidation e.g. a short correction window of 24 hours would allow applicants to rectify minor administrative errors.

Stage 5: Consultation

Users identified four opportunities to streamline referrals and reduce administrative burden.

Table 15: Stage 5: Consultation — Opportunity Summary	
Opportunity	**Description**
Implement a targeted, triaged based in-council specialist referral	Not all applications need referral to every specialist. A targeted and triaged based systems would ensure input only where genuinely required.
Automate report writing and redaction	AI and automation tools could manage routine processing tasks including redaction of public submissions.
Set limited response period for specialist consultees	Applying existing local authority best practice model, set defined response timeframes for internal and external consultees, to reduce end of decision period delays and stress.
Remove or reform the public submission fee	The €20 fee could be recovered through application fees instead, removing barriers to public participation.

Stage 6: Further Information (FI)

Users identified four opportunities, with strong consensus that most FI requests are preventable through better pre-application engagement.

Table 16: Stage 6: Further Information (FI) — Opportunity Summary	
Opportunity	**Description**
Prevent FI through better pre-application	Significant amount of FI requests could be avoided through better guidance and feedback at early engagement.
Deploy experienced planners and specialists upstream	Investing experienced resource at pre-application rather than managing FI delays downstream would reduce costs and timelines.
Address predictable FI triggers proactively	Traffic, cycling and waste storage are frequently requested through FI. National guidance on common triggers could prevent avoidable requests.
Shift from defensive to enabling planning culture	Cultural change to support a more positive, enabling approach to applications would reduce unnecessary FI requests.

Stage 7: Decision

Users identified three proven approaches for improvement already operating in some authorities.

Table 17: Stage 7: Decision — Opportunity Summary	
Opportunity	**Description**
Digitise decision sign-off processes	Email signing of decisions, introduced post Covid, should be standard practice across all councils.
Adopt day 49 completion target	Proven models exist where councils aim for day 49 completion, allowing one week for sign off to avoid last minute pressure.

Standardise condition wording through training	A national conditions library with standardised wording templates, supported by training, for councils and An Coimisiún Pleanála on consistency, would improve decision quality and reduce downstream interpretation problems.

Stage 8: Appeals

Users identified four opportunities for digital integration and resource optimisation.

Table 18: Stage 8: Appeals — Opportunity Summary

Opportunity	Description
Extend ePlanning portal to cover appeals	The ePlanning portal should join up to cover appeals, creating a single portal for the full process.
Councils to adopt selective appeals responses	A lighter-touch selective approach to responding to appeals, already practised by some authorities with positive results, would free immediate capacity.
Introduce time limits for judicial review	Time limits of 6 to 12 months for judicial review would provide certainty and prevent years of delay.
Build on recent capacity improvements	Users reported visible improvements in An Coimisiún Pleanála's decisions and prioritisation. This should be sustained through continued investment in monitoring, capacity and digital integration.

Stage 9: Discharge of Conditions

Users identified four opportunities for standardisation and digitalisation.

Table 19: Stage 9: Discharge of Conditions — Opportunity Summary

Opportunity	Description
Scale proven local IT solutions nationally	Some authorities have developed effective digital systems for managing, tracking and discharging conditions that could be adopted nationally.
Use conditions strategically to reduce FI delays	Conditioning items rather than requesting them through FI would reduce delays without compromising outcomes.
Invest in heritage and conservation specialist capacity	Growing complexity in conservation and brownfield conditions requires targeted investment in specialist resources.
Scale proven local operational management nationally	Where progress happens, it is often driven by council and officer best practice. This best practice should be documented and scaled nationally.

User Voices: What Needs to Change

A sample of what users told us about opportunities to improve the process.

On transforming pre-application

> *"Pre-app should be about constructively getting best from process, to streamline issues down the line."*
> — Housebuilder

> *"To reduce FIs and get application decisions faster you need to change planner's mindset to positive to the application process."*
> — Local Authority Planner

> *"To get the most from pre-app you need TII and NTA and internal experts there."*
> — Housebuilder

> *"We should be freeing up planning officers at this stage, to deal with the more complicated stuff. It could be a gamechanger."*
> — Local Authority Planner

On standardisation

> *"The benefit of standardisation would be a huge time saver. Could help prep for pre-apps and meetings."*
> — Planning Consultant

> *"A lot of the pre-app process can be standardised nationally."*
> — Local Authority Planner

> *"It would be great if there were national consistency and standards. At the moment it varies from council to council. Why?"*
> — Planning Consultant

On quick wins

> *"The one thing that would make a big improvement and save time and frustration, sort the document uploading on ePlanning."*
> — Planning Consultant

> *"Just one visit, rather than two, should get out early. More efficient and better."*
> — Local Authority Planner

> *"Early community engagement on any scheme, it's invaluable. Takes longer at the start, but worth it down the line."*
> — Housebuilder

> *"I'd recommend Council's taking a lighter touch, selective approach to responding to appeals. You don't need to do a response to all appeals."*
> — Local Authority Planner

User Voices: What Needs to Change continued

On smarter use of resources

> *"Why does an extension and a one-off housing application need a planning officer at pre-app?"*
> — Local Authority Planner

> *"Everything is referred pretty much and goes to transportation, drainage, conservation, archaeology. But is it always needed? I would say no."*
> — Local Authority Planner

> *"If you had more planners and experienced planners to resource it, especially at pre-app, instead of delays and costs through FIs."*
> — Housebuilder

On technology and automation

> *"With validation, we have to start looking at using AI and other tools like automation software, currently it's still very manual."*
> — Local Authority Planner

> *"There's an opportunity to connect and integrate ePlanning with IDOX, it's still admin heavy to connect the dots."*
> — Local Authority Planner

On using conditions and reducing FI

> *"FIs could be avoided through better engagement at pre-app. They should be an exception not the norm."*
> — Planning Consultant

> *"Traffic, bike and waste storage are often asked for at FIs. You could almost bet on it."*
> — Local Authority Planner

> *"You can condition most things rather than adding time at FI stage. We should be using this approach more effectively."*
> — Local Authority Planner

On what good looks like

> *"All councils should aim for the day 49 completion. It works, so it's allowing one week for sign-off to avoid it coming down to the wire."*
> — Local Authority Planner

> *"Some councils want everyone feeding back at pre-app. That's great for us, it's clear what they want then."*
> — Housebuilder

4. Cross Cutting Themes and Challenges

4.1 Cross Cutting Problem Themes

Analysis of the stage-specific problem responses identified nine high frequency cross cutting themes that appeared in five or more stages with strong consensus across user groups. These represent 85% of all problem-related responses made by users. They are considered systemic problems due to their significance and dominance across the process and users. The logic and benefit of identifying systematic themes, is that if you can start to address these you maximise the impact of improvements.

Of the remaining 15% of problem related responses, four more isolated themes emerged. Isolated means they represent fewer stages or users.

The themes are presented below in order of how commonly they were reported, with the most widespread first.

Table 20: Cross-Cutting Problem Themes	
Systemic Theme	
1	**Pre-application service not doing its job.**
2	**Not clear upfront what is needed to get an application right first time.**
3	**Normalisation of avoidable FI requests.**
4	**Limited planning authority people capacity.**
5	**Resource spent on statutory administrative burdens with limited value.**
6	**Resource spent on non-priority functions.**
7	**Lack of standardisation creates confusion and inefficiency.**
8	**ePlanning has not evolved to serve those using it.**
9	**Early input from specialists missing, creating problems later.**
Isolated Themes	
10	**Normalisation of appeals.**
11	**Communication and documentation gap**
12	**Strategic infrastructure constraints.**
13	**Public participation barriers.**

4.2 Problem and Opportunity Themes with Description

The stage-by-stage opportunities also reveal a clear set of recurring themes common across the stages with consensus across the user groups.

Table 21: Combined Problem and Opportunity Themes and Descriptions	
Systematic Theme and Description	
1	**Pre-application service not doing its job** **Problem:** generic, non-committal advice and response delays of up to three months cascade into avoidable FI requests. **Opportunity:** standardised pre-application processes nationally, mandatory written documentation and tiered services to free experienced planners for complex work.
2	**Not clear upfront what is needed to get an application right first time** **Problem:** absence of comprehensive guidance and varying requirements across authorities mean applicants cannot know what is needed, driving predictable FI requests. **Opportunity:** self-service guidance and clear technical requirements to enable complete first-time submissions. Addressing themes 1 and 2 together through enhanced early engagement could eliminate most downstream FI requests.
3	**Normalisation of avoidable FI requests:** **Problem:** up to 90% of housing applications receive FI requests, routinely adding six months and delaying 33,000 homes annually. **Opportunity:** better pre-application engagement, upstream specialist deployment and national guidance on predictable FI triggers.
4	**Limited planning authority people capacity** **Problem:** staffing shortfalls and experience gaps affect service quality from pre-application through consultation to appeals; 55% of applications are householder or one-off but capacity spent on these is not tracked. **Opportunity:** strategic delegation and tiered service delivery could optimise existing capacity, with a Dublin authority's delegation model and 'Day 49 Target' providing proven frameworks.
5	**Resource spent on statutory administrative burdens with limited value** **Problem:** dual site visits consume dual site visits consume 85 FTE and €5.3m annually; newspaper notices persist despite questioned value. **Opportunity:** eliminating dual visits would recover up to 42.5 FTE and €2.6m annually. Reviewing statutory notice requirements could remove further waste.
6	**Resource spent on non-priority functions**: **Problem:** experienced planners handle routine applications; all applications referred to specialists regardless of need. Manual processes persist where automation could deliver efficiency. **Opportunity:** supervised clerical teams for routine work, automation for validation, report writing and redaction and triaged referrals focusing specialist input where genuinely needed.
7	**Lack of standardisation creates confusion and inefficiency**: **Problem:** this problem manifests across multiple stages, with users reporting they must navigate entirely different procedures for each Local Planning Authority. **Opportunity:** national consistency across site notice templates, validation rules, pre-application procedures and condition libraries. Proven local innovations to be mandated nationally through the coordination authority.
8	**ePlanning has not continued to evolve to serve those using it** **Problem:** document uploading failures, extensive manual workarounds and system fragmentation create over 10,000 days of avoidable delay annually. **Opportunity:** fix document uploading as the most impactful quick win, integrate ePlanning with back-office systems and extend coverage across the complete journey including appeals. AI deployment for validation could eliminate current manual burdens.

9	**Early input from specialists missing, creating problems later** **Problem:** key external bodies including TII and NTA are absent from pre-application; case officers struggle for timely specialist responses. The same gaps generate problems across multiple stages. **Opportunity:** mandatory specialist participation at pre-application, response protocols with clear timelines and triaged referrals focusing specialist input on genuinely complex cases.
Isolated Problem Themes and Descriptions	
10	**Normalisation of appeals**: **Problem:** appeals have shifted from exceptional to routine, adding 16 weeks to 6+ months. The development sector now factors appeals into every major project timeline. **Opportunity:** extend ePlanning to cover appeals and adopt selective response approaches already practised successfully by some authorities.
11	**Communication and documentation gaps** **Problem:** lack of standardised documentation at pre-application creates interpretation risks and accountability gaps at submission and decision stages. **Opportunity:** Mandatory written documentation standards, minute templates and digital communication systems could eliminate interpretation risks whilst creating accountability trails for continuous improvement.
12	**Strategic infrastructure constraints** **Problem:** infrastructure capacity blocks development activation despite planning approvals. Applicants cannot unlock these constraints alone. **Opportunity:** coordinated infrastructure planning frameworks, building on successful models such as the Dublin SDZ partnership approach.
13	**Public participation barriers** **Problem:** split views on whether site notice placement and the €20 submission fee create participation barriers, with some reporting the fee limits engagement primarily to motivated objectors. **Opportunity:** fee elimination with cost recovery through adjusted application fees could enhance broader participation whilst maintaining system funding.

4.3 Defining Strategic Challenges

The problem and opportunity themes can be further grouped into five strategic challenges:

Table 22: Defining Strategic Challenges		
No	**Strategic Challenge**	**Problem Theme**
1	**Pre-Application Deficits Leading to Avoidable Problems Later**	• Problem 1: Pre-Application Service Not Doing Its Job • Problem 2: Not clear upfront what is needed to get an application right the first time • Problem 3: Normalisation of avoidable FI requests.
2	**Limited Capacity Spent on Avoidable, Non-Priority Matters**	• Problem 4: Limited Planning Authority People Capacity impacting quality and speed (staff shortages) • Problem 5: Resource spend on Statutory Administrative Burdens with limited value (Statutory inefficiencies)

		• Problem 6: Resource spent on non-priority functions (Operational Inefficiencies) • Problem 9: Early input from specialists missing creating problems later
3	**Lack of Standardisation Leading to Avoidable Waste**	• Problem 7: Lack of Standardisation creates confusion and inefficiency (Lack of Standardisation) • Problem 11: Poor Communication and Documentation Gaps
4	**Digital as a Burden, Not an Enabler**	• Problem 8: ePlanning has not continued to evolve to serve those using it
5	**Lack of Whole System View, Oversight and Owner**	• Problem 10: Normalisation of Appeals Creating Whole System Impacts • Problem 12: Strategic infrastructure showstoppers blocking build out • Problem 13: Fee and lack of transparency as a barrier to positive public engagement and participation

5. Why Problems Exist and Persist

The preceding chapters document problems and opportunities that users know well. Planning officers, housebuilders and consultants independently identified the same issues and arrived at similar conclusions about what needs to change.

Given the level of consensus across user groups across problem and opportunity themes, it is reasonable to assume measures to address these may already be in motion. It is therefore sensible to consider these and look at how this research aligns or conflicts. It also provides an opportunity to consider where there are gaps in understanding or practice. The aim is to determine what can help improvements accelerate and what may be acting as a barrier.

What the evaluation reveals helps to explains why problems persist despite efforts and what must be tackled to bring change about.

5.1 What is Known, Missing and Why this Matters

This section examines existing reform initiatives across three domains, strategic level, process-specific level and performance measurement.

5.1.1 Strategic and National Level

What Exists

Delivering Homes, Building Communities: An Action Plan on Housing Supply and Targeting Homelessness (2025) is the Government's current housing strategy, targeting 300,000 homes by 2030. It embeds planning reform throughout as a cross-cutting enabler, recognising that 'effective planning is key to getting homes built at speed'. The Planning and Development Act 2024 provides the legislative foundation for this reform. These initiatives operate within the framework of the National Planning Framework, Ireland's overarching spatial strategy (Government of Ireland, 2025)

The Ministerial Action Plan on Planning Resources (2024) comprises 14 actions to improve planning. Thirteen of these actions focus on recruitment and retention of planners. Action 14 tasks a working group with identifying efficiency opportunities, which this research concerns. It is not clear who makes up the working group. The action plan’s overarching steering group comprises public sector bodies only. Planning applicants including major housebuilders or representative bodies are not included. The working groups operate in an advisory capacity, reporting to civil servants rather than directly to the Minister. The Action Plan does not explain whether or how the civil servants report to the Minister or what the Minister’s role is (Government of Ireland, 2024). To date, the working group has not published its findings.

Digital transformation of the planning system is underway through multiple initiatives. The ePlanning platform, delivered through a public sector partnership led by Local Government Management Association (LGMA), is now operational across all but one of the 31 planning authorities. This provides a national front-end for all planning application submissions and fee payments. The Ministerial Action Plan on Planning Resources refers to the LGMA led National Planning Project. Its purpose is to develop ‘a single end-to-end ICT solution for planning authorities nationally that will produce real-time, quality data, in a consistent and

standardised manner benefiting all stakeholders involved with the planning system in Ireland' (Government of Ireland, 2024). No detail on the project's timeline, governance or implementation approach is provided.

Ireland also has a strong geospatial data foundation. The state provides access to spatial data through GeoHive, and MyPlan.ie serves as the national planning data hub, with its Generalised Zoning Types (GZT) layer already demonstrating that zoning data can be standardised across all 31 local authorities. Planning registers are merged into a national database, national bodies publish spatial datasets relevant to planning decisions, and Ireland's open data licensing means this data is available for reuse, giving it a structural advantage over jurisdictions like the UK where commercial licensing created barriers. Appendix 4 sets out this foundation in detail. However, having data in various portals is not the same as having the standardised, machine-readable data needed to power a modern digital planning system. This gap is critical and is examined below.

The Digital Ireland Framework (2021) sets out the principles and standards government expects for all public service delivery including digital transformation. This commits government to establishing 'a trusted, user driven, intuitive, inclusive and efficient world leading digital government service'. It also states that those designing public services should ask and address the following 'what does the user need to achieve and how can we make that simple?' rather than simply digitising existing processes. It advocates for 'agile ways of working and multidisciplinary teams' and 'co-creation' with users. The framework's implementation is overseen by a Cabinet Committee chaired by the Tánaiste, supported by clear governance structures, objectives, targets, timelines, regular monitoring and reporting (Government of Ireland, 2021). These principles align with established public service design theory, which recognises that effective services are designed around user needs, understood as whole journeys and measured by service outcomes rather than administrative outputs (Tarling, 2023; Pope, 2024; Downe, 2020).

Ireland is well positioned to succeed. With 31 local planning authorities rather than hundreds, ePlanning already operational as a publicly owned national platform and enforcement mechanisms available through National Planning Statements under the 2024 Act. Appendix 3 examines these structural advantages in detail and Appendix 4 sets out how they can be leveraged to establish a national planning data foundation.

What is Missing and Why this Matters

Strategic Governance

Critical gaps exist. No entity has authority to coordinate planning application processes across Ireland's 31 independent planning authorities. No individual is named as accountable for process performance or outcomes. The Ministerial Action Plan on Planning Resources established working groups in advisory capacity only, they report to civil servants and lack executive powers to mandate change. No shared vision defines what the planning application process should achieve. No analysis has been undertaken to draw on international experience where user-centred approaches to planning have been applied. Lessons from comparable jurisdictions remain unexamined.

Advisory groups without executive authority produce only voluntary recommendations. Individual authorities choose whether to adopt them. Previous attempts at reform through advisory coordination demonstrate this approach produces temporary gains which gradually

degrade as priorities shift and staff change. Without authority to mandate change, even well-designed reforms remain unimplemented. Learning from comparable jurisdictions could accelerate reform and reduce the cost of trial and error.

Legislative Implementation Gaps
No systematic analysis has examined whether the Planning and Development Act 2024 reduces or increases operational burden on those who use the planning application process. The gap between legislative intent and operational reality remains unexamined. New requirements are introduced without being tested against their practical impact on service delivery.

Legislative changes may add unintended burden. Without operational impact assessment, requirements designed to improve the system can slow housing delivery or add unnecessary complexity. The pattern continues because no mechanism bridges policy development and service delivery reality.

Service Design and Measurement Gaps
Ireland's Digital Ireland Framework (2021) commits government to designing services around what users need to achieve, involving users in design and measuring performance (Government of Ireland, 2021). Public service design theory confirms these as essential, not aspirational (see Appendix 2). Yet reform efforts to date have not approached the planning application process in this way. No research asks who it serves, what outcomes it should achieve or how user needs should drive design. Primary users, planning applicants, housebuilders and consultants, are excluded from meaningful reform design; the Ministerial Action Plan's Steering Group comprises public sector bodies only.

The LGMA National Planning Project presents an opportunity to apply these principles, but its governance structure poses risks. The LGMA is primarily funded by local authorities and governed by a Board of local authority chief executives, with projects delivered through working groups where each participant appears to represent their own authority, not the whole. The pull is naturally toward 31 individual needs rather than the whole system outcome first. As a result, the pull will be toward preserving existing ways of working rather than challenging or radically changing them. This reflects the institutional incentives of the governance model, not the intentions of those involved, who are committed to improvement. Addressing this risk is essential if the National Planning Project is to deliver its potential for true public service transformation. This challenge is compounded by the absence of any end-to-end performance measurement framework at present. Without standardised reporting, shared success metrics or comparable data across authorities, it is impossible to know whether the system is delivering for those who use it, or where improvement should be targeted.

Figure 7 illustrates the principles that underpin England's Digital Planning Programme, where service design and user needs drive digital development. These align with Ireland's own Digital Ireland Framework and the public service design theory set out in Appendix 2. The gap is not in what Ireland has committed to, but how it is not applying this to the planning application process.

Figure 6: *The principles of good service design (Open Systems Lab, 2023).*

The planning application process is a public service, yet it is not being designed or delivered as one. Without a service-led approach, current reform efforts do not meet the government's own mandate as set out in the Digital Ireland Framework. Users who experience problems daily are excluded from reform design, meaning improvements address perceived rather than actual problems. And without performance measurement, reforms cannot be targeted, progress cannot be demonstrated and best practice cannot be identified or scaled.

Planning Data Standardisation Gap

Ireland's geospatial base is strong, but the planning data that sits on top of it is fragmented. Each of the 31 local authorities publishes zoning, ACAs, Protected Structures and site-specific objectives in different formats, with no shared schema or vocabulary (Appendix 4).

Without standardised data, planning officers spend hours per application manually checking constraints across separate systems, the OPR's task of reviewing every development plan is made harder when each of 31 plans uses different data formats, and public access to planning information is constrained by fragmentation. These consequences affect housing delivery, public sector efficiency, regulatory oversight and citizen trust. Appendix 4 sets out the full scale of this gap in detail.

5.1.2 Planning Application Process Stage-Specific Level

What Exists

The OPR promotes good planning practice by conducting research and sharing best practice guidance. As part of this role, it has published detailed studies on individual stages of the planning application process.

Case Study Paper CSP02 (2021) examines online planning services, addressing digital submission processes. Case Study Paper CSP04 (2021) examines pre-application consultation services, documenting variation in service quality and provision across authorities. Case Study Paper CSP06 (2022) examines planning application validation processes, identifying inconsistencies in how validation requirements are applied. Practice Note PN03 (2022) provides guidance on planning conditions (OPR, 2021, 2022).

Each piece of research identifies problems within its specific stage and makes recommendations for improvement. This provides valuable insights into individual operational issues and opportunities, which this research has validated. However, notable gaps remain.

What is Missing and Why this Matters

The stage level gaps are substantial. Five of the nine stages in the planning application process have no dedicated analysis:

- Public Notice (Stage 2)
- Consultation (Stage 5)
- Further Information (FI) requests (Stage 6)
- Appeals (Stage 8)
- Discharge of Conditions (Stage 9)

Cross-stage gaps are equally significant. No analysis examines how problems in one stage create or amplify problems in later stages. The cascade effects that users report, such as inadequate pre-application advice leading directly to FI requests six months later, have not been mapped in existing research. No understanding exists of multiplicative impacts, where problems combine and compound as applications progress through the process. No research has mapped the end-to-end user experience across all stages from the perspective of planning applicants.

Stage-by-stage analysis in isolation misses systemic patterns. When pre-application is examined separately from FI requests, the direct causal relationship between early-stage failure and later-stage delay remains invisible. Stage-specific recommendations, however well-intentioned, cannot address problems that span multiple stages or originate elsewhere in the process. Improving validation processes will not prevent invalidations if submission requirements vary across 31 authorities. Enhancing online services will not reduce delays if the underlying process being digitised is inefficient.

5.1.3 Metrics and Performance Data

What Exists

Performance data exists from several sources and covers several basic metrics. The Central Statistics Office (CSO) provides data on planning permissions granted, distinguishing between dwelling permissions and other permission types. The OPR publishes its annual "Planning in Numbers" providing application volumes and some processing time data. The Ministerial Action Plan on Planning Resources identifies a staffing shortfall of 25 to 30% across the planning system. Local Authority Performance Indicator Annual Reports from the National Oversight and Audit Commission (NOAC) monitor building inspections as a percentage of new builds notified; planning appeals determined by An Bord Pleanála (now An Coimisiún Pleanála); planning enforcement cases investigated and closed; cost per

capita of the planning service; fire safety certificate decision times. This provides a high-level picture of system activity and resource.

What is Missing and Why this Matters

Where Local Authority Capacity Goes is Unclear
CSO data reveals a significant workload imbalance. In 2023, 55% of all planning applications concerned householder or one-off housing. Together these delivered just 12% of new housing units and generated approximately 20% of fee income. By contrast, 5% of applications delivered 88% of new housing (Appendix 1). The data to understand this workload profile exists nationally.

What does not exist is any tracking of officer capacity against these application types at local authority level. The system can see what comes in but not how much resource each category consumes. Without this, it is not possible to determine whether limited capacity is directed to the application types that deliver the most housing or absorbed by lower-output categories where efficiencies could be targeted through digital services, self-service guidance and automation.

Processing time is not broken down by stage, so it is not possible to identify whether delays concentrate at pre-application, validation, consultation or FI. User satisfaction data, for example on ePlanning, is not collected. There is no systematic feedback that captures the planning applicant's experience of service quality, pain points or improvement priorities.

Without baseline data, reforms cannot be targeted to highest-impact areas. Should efforts focus on validation, pre-application or FI processes? These questions cannot be answered without performance measurement. Progress cannot be measured. If reforms are implemented, success or failure cannot be demonstrated. Accountability cannot be established. If the system does not understand how the process performs for its users, it cannot identify or respond to their needs.

Absence of Improvement Mechanisms
No standardised performance data enables comparison across the 31 authorities. Some monitoring exists: the OPR with LGMA track validation via ePlanning and the CSO reports applications submitted and determined but this does not provide the depth needed to distinguish good performance from poor in relation to the process working to delivering the outcome of making faster decisions, or to identify what is driving the difference.

Individual authorities may have developed effective approaches to common problems, but without comparative performance data, these remain isolated local innovations. The system cannot learn from its own successes. Which authorities are performing well and why? What practices should be scaled? These questions cannot be answered.

5.2 From Symptoms to Root Causes

5.2.1 Root cause analysis

The research reveals a striking contrast. System users can clearly identify the problems and opportunities for improvement outlined in Chapter 4, yet the measures taken by the agents of change described in Chapter 5 still fall significantly short, despite the genuine will of all involved to improve the system.

The question is: why is this happening?

To understand this and identify the change required, a root cause analysis of the problems was undertaken to determine the underlying cause rather than just the surface level symptoms that present.

The study systematically applied the 'five whys' method and analysed each problem across three dimensions:

- Structural causes: understanding the formal frameworks that determine who has power to act and how organisations are configured, including rules, authority and institutional design.
- Behavioural causes: examining how people choose to act within those structures, including professional norms, risk appetite and cultural attitudes to change.
- Operational causes: looking at the capabilities and constraints including resource and technology that prevent resolution even where the knowledge and will exist.

By repeatedly asking 'why?', the approach uncovered the deeper causes shaping user experiences, consistent with user-centred and service-design practice, where identifying root causes is essential to improving whole service journeys (Kumar, 2012).

This method helps to reveal why problems persist despite widespread recognition: structural gaps enable behavioural patterns to take hold, which can then compound operational constraints. The analysis revealed consistent and repeating patterns.

5.2.2 Root Causes of the Five Strategic Challenges

The root cause of the five strategic challenges identified in Chapter 4 revealed the following:

Challenge 1: Pre-Application Deficits Leading to Avoidable Problems Later

Root cause: The structural cause (no authority sets standards) exists because no entity has power to mandate standards across 31 independent authorities. The behavioural response (risk-averse advice) emerges from this structural gap. The operational constraint persists because no authority can coordinate digital development with process requirements.

Challenge 2: Limited Capacity Spent on Avoidable, Non-Priority Matters

Root cause: The structural cause (no institutional responsibility for efficiency) exists because no authority has mandate to measure and manage system-wide performance. The behavioural response (treating efficiency as local not national) emerges from this structural void. The focus remains on increasing planner numbers rather than improving efficiency in parallel because no entity can coordinate both approaches.

Challenge 3: Lack of Standardisation Leading to Avoidable Waste

Root cause: The structural cause (no authority to mandate standards) is the direct result of absent strategic ownership. The behavioural pattern (variations appearing minor) persists because the measurement gap prevents recognition of systematic costs. The operational pattern (fragmentation re-emerging) continues because no authority manages standards as a service requiring continuous maintenance. The same root cause applies to planning data: the legislative tools to mandate standards now exist through National Planning Statements, but no authority has yet applied them to planning data.

Challenge 4: Digital as a Burden, Not an Enabler

Root cause: The structural cause (no authority to mandate process standardisation first) directly reflects absent strategic ownership. The behavioural pattern (serving 31 authorities not transforming them) emerges from this structural reality. The operational constraint (cannot compel integration) persists because no entity has coordinating authority. The absence of standardised planning data reinforces this pattern, limiting digital investment to digitising existing manual processes rather than transforming them.

Challenge 5: Lack of Whole System View, Oversight and Ownership

Root cause: The structural cause (no overall view, oversight and ownership) exists because Ireland's planning system was designed with 31 independent authorities and no entity empowered with ensuring the whole operates effectively as a public service for users. The behavioural response (piecemeal reforms and lack of transparency) emerges from this structural gap. The operational constraints (lack of performance measurement and data, no user involvement by applicants, lack of agency join up) persist because no authority has both the mandate and capability to bridge policy and practice.

5.3 Convergence and Emergence of a Meta Challenge

The analysis of Challenges 1 to 5 revealed something fundamental. Each challenge's root causes ultimately traced back to this same strategic coordination and ownership vacuum, similar to that presented in Challenge 5 and its root cause.

The original Challenge 5 identified the lack of whole system view and fragmented ownership as a distinct problem alongside the other four challenges. However, the root cause analysis demonstrated that this is not merely one challenge among equals, it is the structural precondition that enables all other challenges to exist.

The root cause analysis brings about a convergence of newly defined problem themes that represent the underlying meta challenge:

- Problem 14: lack of strategic ownership and accountability
- Problem 15: lack of shared outcome and focus; and
- Problem 16: not approached as a public service.

The following table looks at the problem theme definitions and opportunities, to supplement those set out in Table 22 in Chapter 4. The public service delivery theory set out in Appendix 2 provides the analytical basis for this assessment.

Table 23: Meta Challenge 5: Lack of Whole System View, Oversight and Ownership	
Meta Problem Themes: Description, Example, Impact and Opportunity	
14	**Problem: Lack of Strategic Ownership and Accountability** **Description:** No single entity accountable for system performance. No authority coordinates 31 planning authorities or mandates standards across the system **Example:** Without an entity that can set and enforce standards, Challenge 1 (pre-application deficits) persists because officers lack institutional cover. Challenge 2 (resource waste) continues because no one can mandate efficient deployment. Challenge 3 (lack of

	standardisation) is locked in because 31 authorities develop their own approaches. Challenge 4 (digital burden) persists because technology automates rather than transforms. **Impact:** Pre-application quality varies wildly, standardisation impossible, reforms remain unimplemented, digital systems automate chaos rather than eliminate it
15	**Problem: Lack of Shared Outcome and Focus** **Description:** No shared measurable outcome, such as delivering timely planning decisions for applicants, defines what the system and partners are there to achieve. Without this, individual parts of the system optimise for their own concerns. Each is rational on its own terms but collectively they undermine what the system should achieve. **Example:** Without a shared outcome, all four challenges persist unchecked. Challenge 1's FI cascade cannot be quantified across authorities because there is no outcome to measure against. Challenge 2's resource waste continues because no one is assessing whether resource deployment serves the outcome. Challenge 3's cumulative costs of variation stay invisible. Challenge 4's digital systems are not assessed against whether they help deliver timely decisions. Without outcome-based measurement, problems cannot be targeted and progress cannot be demonstrated. **Impact:** Each organisation optimises its own piece without ensuring the whole system delivers for those who use it. Without measurement linked to outcomes, problems remain invisible and reform efforts cannot be targeted or assessed.
16	**Problem: Not Approached as a Public Service** **Description:** The planning application process exists to deliver planning decisions for applicants. Yet it is not being approached with this purpose in mind. No one is asking who the system serves, what outcomes it should achieve, or how user needs should drive its design. It is treated as process for process's sake, rather than a public service that exists to achieve an outcome for those who use it. **Example:** Primary users, planning applicants, housebuilders and consultants, are excluded from reform design; the Ministerial Action Plan's Steering Group comprises public sector bodies only. Current reforms proceed in fragments, addressing individual stages without understanding the user journey across the whole process. Pre-application guidance is published but not mandated (Challenge 1). Digital systems are deployed but burden remains because they digitise existing processes rather than redesigning around user needs (Challenge 4). **Impact:** Without treating this as a public service, reforms address symptoms rather than causes. Solutions miss actual pain points because they are designed without those who experience them. The system cannot improve because it has not defined what improvement means for those it serves.

5.4 Moving From Failure to Success

Understand the root cause of the problems and challenges identified ensures that efforts are invested in the right places to bring about transformational change. Challenge 5, Lack of Whole System View and Oversight is the key challenge to tackle, without doing so problems will persist and resist change.

Resolving this requires both ownership of the whole system and a fundamental shift in approach and focus, treating the planning application process as a public service, designed around those who use it and measured by its outcomes.

6. Reforms

This chapter presents the reforms required to bring transformational change of the planning application process in Ireland about. These are designed to address the systemic problems and challenges identified through user research and analysis in Chapters 2 to 5.

The proposals demonstrate the scale of change required to move from current to improved future state. Reforms 1 to 5 are interdependent. They cannot be treated as a menu from which individuals are selected. Implementing one without the others will produce the same cycle of surface level change that has frustrated and prevented seismic transformation to date. Transformational improvement requires all five to work together.

Reform 1 is the critical enabler: it establishes ownership, aligns the system around a shared outcome and shifts the approach to treat the planning application process as the public service it is. Reforms 2 through 5 tackle the operational problems directly: frontloading to prevent delays, eliminating waste to free capacity, standardisation to end needless variation and digital systems that support rather than burden users.

The evidence in this report demonstrates that the potential for improvement is substantial and within reach. Realising it requires commitment to a shared mission, delivering faster decisions, simply, for users, underpinned by clear leadership and national accountability.

Table 24: Reforms 1 to 5 and related Challenge and Problem from Tables 22 and 23

No	Reform	Reform action	Challenge and Problem
1	**From Unmet Needs to a National Public Service**	1.1 Establish ownership and authority 1.2 Outcome based focus 1.3 Shift the approach	Challenges; Meta + Challenge 5: Problems 14, 15 and 16 Problems 10, 12 and 13
2	**From Pre-Application Deficits to Proactive Frontloading**	2.1 Design services to serve user needs 2.2 Give applicants what they need	Challenge 1: Problems 1, 2 and 3
3	**From Avoidable Waste to High-Value Resource Deployment**	3.1 Monitor and manage capacity 3.2 Eliminate mandatory waste 3.3 Adopt proven operational practices	Challenge 2: Problems 4, 5, 6 and 9
4	**From 31 Individual Systems to One that Allows for Local Context Variability**	4.1 Immediate standardisation 4.2 Comprehensive standardisation 4.3 Maintain national consistency	Challenge 3: Problems 7, 11
5	**From Digital Fragmentation to Digital as an Enabler**	5.1 Urgent technical interventions 5.2 System integration programme 5.3 Test, adapt proven solutions 5.4 Build digital capability to deliver	Challenge 4: Problem 8

6.1 Reform 1: From Unmet Needs to A National Public Service

Table 25: Reform 1 summary table		
Ref R	**Action**	**Sub-actions R**
1.1	**Establish ownership and authority**	1.1.1 Implementation powers 1.1.2 Transition from reform to operations 1.1.3 Users at the centre, at strategic and operational levels
1.2	**Outcome based focus**	1.2.1 Mission-focused mandate 1.2.2 Clear mission-goal-objective hierarchy 1.2.3 Deliver wins early, be realistic and ambitious
1.3	**Shift the approach**	1.3.1 Define and enforce service levels 1.3.2 Analyse performance to drive improvement 1.3.3 Test legislation against operational impact 1.3.4 Maintain a legislative reform agenda
1.4	**Establish the data and digital foundation**	1.4.1 Establish national planning data standards 1.4.2 Build the national planning data foundation 1.4.3 Build the feedback loop between delivery and legislation

R1.1 Establish Ownership and Authority

R1.1.1 Implementation powers

Establish a coordination authority with power to mandate process standards across all 31 planning authorities, coordinate legislation with operations and compel standardisation. This should ideally be directly led by the Minister with potential for delegation to empowered existing organisations or programmes including Office of the Planning Regulator (OPR) and the Local Government Management Association (LGMA) National Planning Project. Define terms of reference, governance structure and accountability mechanisms. The specific form matters less than ensuring power to require standardisation, mandate efficiency measures and direct digital development priorities.

R1.1.2 Transition from reform to permanent service management

Build initial capacity for reform implementation, then transition to long-term service ownership through continuous performance monitoring, regular user research cycles and prevention of fragmentation re-emerging.

R1.1.3 Users at the centre — at strategic and operational levels

Ensure those who the system serves are actively involved in reform design and implementation at the strategic and the operational level.

R1.2 Outcome Based Focus

R1.2.1 Mission-focused mandate

The authority’s mandate should focus on removing waste and administrative burden to enable faster planning application decisions, with operational efficiency and service delivery

consistency as its core focus. All reform actions, investments and legislative should be tested against this mandate.

R1.2.2 Clear mission-goal-objective hierarchy

Establish a hierarchy that all stakeholders commit to achieving. For example: Mission: enable housing delivery to meet government targets of 55,000 homes annually. Goal: faster planning application decisions. Objective: reduce average processing time by 20% within two years, with continuous improvement thereafter.

R1.2.3 Deliver wins early — be realistic and ambitious about outcomes

Identify quick wins that can be delivered early alongside structural changes requiring longer implementation. Prioritise actions that deliver measurable improvement within existing powers before pursuing those requiring legislation.

R1.3 Shift the Approach

R1.3.1 Define and enforce service levels

Establish a performance framework and success metrics to track, monitor and manage service delivery across all 31 authorities. Require all authorities to report against common metrics. Publish comparative data for transparency and enable identification of best practice.

R1.3.2 Analyse performance to drive improvement

Use performance data to identify patterns, bottlenecks and improvement opportunities, then scale what works. Authorities consistently underperforming should receive targeted support. Those excelling should have their approaches studied and scaled nationally as service standards.

R1.3.3 Test legislation against operational impact

All new legislation must be tested against the service mission through operational impact assessment before implementation. Policy teams should work with operational staff and users to assess practical impact of proposals before enactment. Requirements that would slow housing delivery or add unnecessary complexity should be redesigned or rejected.

R1.3.4 Maintain a legislative reform agenda

Where existing legislation creates mandatory waste, the authority should pursue amendments whilst implementing administrative workarounds.

R1.4 Establish the Data and Digital Foundation

R1.4.1 Establish national planning data standards

Mandate national planning data standards through a National Planning Statement, defining data specifications for each designation that affects planning decisions.

R1.4.2 Build the national planning data foundation

Deliver the national planning data foundation through a central team that standardises existing data across all 31 authorities, alongside a mandate requiring all new development plans to be produced to standards.

R1.4.3 Build the feedback loop between delivery and legislation

Establish a formal mechanism through which learning from digital delivery informs legislative reform and proposed legislative changes are tested against operational reality before taking effect.

6.2 Reform 2: From Pre-Application Deficits to Proactive Frontloading

Table 26: Reform 2 summary table		
Ref R	**Action**	**Sub-actions R**
2.1	**Design service to serve user needs**	2.1.1 Establish service standards 2.1.2 Implement tiered and triaged service response 2.1.3 Amend the four-week meeting mandate 2.1.4 Mandate specialist engagement for complex developments
2.2	**Give applicants what they need**	2.2.1 Commission FI pattern analysis 2.2.2 Develop national guidance addressing predictable issues 2.2.3 Create comprehensive self-service portal 2.2.4 Establish technical standards for complete applications 2.2.5 Mandate written documentation for all pre-application advice

R2.1 Design Service to Serve User Needs

R2.1.1 Establish service standards

Set and enforce service standards specifying response timeframes (e.g. maximum four weeks), documentation requirements (mandatory written advice) and quality expectations (substantive rather than generic guidance). Compliance should be monitored through performance reporting under R1.3.1.

R2.1.2 Implement tiered and triaged service response

Prioritise complex, larger-scale applications where professional judgement adds most value. Reduce resource spent on routine applications through clear guidance that meets applicant needs without consuming scarce planning officer capacity. Define triage criteria based on development type and complexity. Fees should be considered for meetings to support resource provision and ensure demand reflects genuine need.

R2.1.3 Amend the four-week meeting mandate

Amend the Planning and Development Act 2024 requirement that authorities ‘shall hold a consultation meeting’ within four weeks when requested. Direct routine applications to self-service guidance and reserve meetings for complex developments. This should be pursued as a priority.

R2.1.4 Mandate specialist engagement for complex developments

For complex housing developments at pre-application, specialists should be engaged to issue advice where relevant, with defined response timeframes. Standards for specialist participation should be set based on application thresholds. Fees could be introduced to support resource provision.

R2.2 Give Applicants What They Need

R2.2.1 Commission FI pattern analysis

Identify the most common FI triggers, their typical requirements and standard responses, building comprehensive understanding of predictable problems. Establish the baseline data currently absent to inform this.

R2.2.2 Develop national guidance addressing predictable issues

Publish technically detailed, nationally consistent guidance covering recurring topics: drainage details for one-off housing, parking calculations for residential developments, heritage impact assessments for protected structures.

R2.2.3 Create comprehensive self-service portal

Guide applicants through requirements using plain English questions, with the system determining what information is needed based on development type and location. A ‘do I need planning permission’ self-service feature would deliver immediate benefit.

R2.2.4 Establish technical standards for complete applications

Set national checklists and standards and embed in ePlanning. Develop automatic validation at point of submission to help prevent incomplete applications entering the system.

R2.2.5 Mandate written documentation for all pre-application advice

Standardised minute templates for all pre-application engagement, creating clear records.

Mandatory templates should be managed through an evolved ePlanning offer, protecting both applicants and officers by creating an auditable record.

6.3 Reform 3: From Avoidable Waste to High-Value Resource Deployment

Table 27: Reform 3 summary table

Ref R	Action	Sub-actions R
3.1	**Understand where capacity goes**	3.1.1 Track resource deployment 3.1.2 Address retention alongside recruitment 3.1.3 Understand specialist resource needs
3.2	**Eliminate statutory waste**	3.2.1 Eliminate duplicate site visits 3.2.2 Review the site notice stage 3.2.3 Consider newspaper notice effectiveness
3.3	**Adopt proven operational practices**	3.3.1 Standardise proven triage models 3.3.2 Adopt proven referral triaging 3.3.3 Require selective appeals responses

R3.1 Understand Where Capacity Goes

R3.1.1 Track resource deployment

Require authorities to report how planning officer time is allocated across activities, identifying where professional expertise is consumed by administrative tasks versus planning assessment, as part of the performance framework under R1.3.1.

R3.1.2 Address retention alongside recruitment

Develop complementary retention strategies alongside recruitment, reviewing compensation frameworks, career development opportunities and working conditions.

R3.1.3 Understand and manage specialist resource needs

Establish the resource picture for non-planner specialists supporting local authority decisions, then manage resource more effectively and address deficits. Once established, this should form part of an action plan to support capacity where it is most needed, including consideration of shared regional specialist arrangements.

R3.2 Eliminate Mandated Waste

R3.2.1 Eliminate duplicate site visits

Pursue regulatory amendments to end the requirement for duplicate site visits. In the interim, issue guidance to ensure junior officers including non-planners can be deployed for site notice verification visits rather than the case officer, to deliver immediate capacity relief.

R3.2.2 Review the site notice stage

Commission analysis of alternative notification approaches used internationally, examining whether digital notification, neighbour letters or enhanced online publication could achieve better public engagement at lower cost.

R3.2.3 Consider newspaper notice effectiveness

Evaluate the effectiveness of mandatory newspaper notices and explore digital alternatives that could maximise reach whilst reducing burden. Consider coupling this with an enhanced ePlanning notification system to maximise reach whilst reducing burden.

R3.3 Adopt Proven Operational Practices

R3.3.1 Standardise proven triaging models

Direct all authorities to follow proven resource triaging and prioritisation models, with deviation requiring justification. Identify high-performing authorities, document their triaging models and mandate adoption across all 31 authorities. Support change with training and peer support where appropriate.

R3.3.2 Adopt proven referral triaging

Base specialist referrals on development type, scale and location, ensuring specialist input only where genuinely needed. Establish risk-based referral and triaging criteria.

R3.3.3 Require selective appeals responses

All authorities should adopt a selective approach to appeals responses. Document the best practice selective appeals response model. Direct authorities with planner capacity issues. This immediately frees capacity without legislative change.

6.4 Reform 4: From 31 Individual Systems to One that Allows for Local Context

Table 28: Reform 4 summary table

Ref R	Action	Sub-actions R
4.1	**Immediate standardisation**	4.1.1 Standardise site notice templates 4.1.2 Create national conditions library 4.1.3 Standardise validation checklists

4.2	**Comprehensive standardisation**	4.2.1 Mandate single national forms 4.2.2 Standardise submission requirements nationally 4.2.3 Standardise pre-application procedures
4.3	**Prevent future fragmentation**	4.3.1 Manage standards through national governance 4.3.2 Embed standards in technology platforms 4.3.3 Establish formal change management process

R4.1 Immediate Standardisation

R4.1.1 Standardise site notice templates

The coordination authority should develop a single national site notice template through user co-design, embed it in ePlanning and mandate its use nationally.

R4.1.2 Create national conditions library

Develop a national library of standard routine conditions grouped by topic and development type, embedded in ePlanning and mandate use. Where the specific planning context of an application requires a bespoke condition, this is permitted with justification and coordination with the authority.

R4.1.3 Standardise validation checklists

Develop a single checklist for each application type, embedded in ePlanning with automatic validation preventing submission of incomplete applications.

R4.2 Comprehensive Standardisation

R4.2.1 Mandate single national forms

Develop national application forms through user co-design, test with applicants, then mandate nationally. Where development type or location creates genuinely different requirements, these should be built into the national forms as context-based variants rather than left to individual authorities to add.

R4.2.2 Standardise submission requirements nationally

Each application or development type should have nationally defined submission requirements specifying what documents and information must accompany an application.

Authorities identifying gaps should address them through national review rather than local additions and these built as applicable options within the nation requirements.

R4.2.3 Standardise pre-application procedures

Set national standards that define minimum service levels, mandatory written responses and quality expectations, consistent with the service standards under R2.1.1.

R4.3 Maintain National Consistency

R4.3.1 Manage standards through national governance

All proposed changes to national standards should go through the coordination authority.

The authority should establish a process for considering and reviewing proposed changes. Where a genuine context-based need arises, the solution should be developed nationally so all authorities, areas and applicants benefit.

R4.3.2 Embed standards in technology platforms

Build standards into ePlanning and other systems so they are maintained centrally and updated once, rather than requiring 31 authorities to implement changes individually. Centrally managed forms, checklists and procedures prevent the re-emergence of fragmentation.

R4.3.3 Establish formal change management process

When updates are needed, develop them nationally, test with users, then deploy simultaneously across all authorities. The coordination authority should establish a structured process to monitor, manage the service and continue to respond to users need.

6.5 Reform 5: From Digital Fragmentation to Digital as an Enabler

Table 29: Reform 5 summary table

Ref R	Action	Sub-actions R
5.1	**Urgent technical interventions**	5.1.1 Implement critical ePlanning fixes 5.1.2 Establish dedicated user support 5.1.3 Create system status transparency
5.2	**System integration programme**	5.2.1 Achieve integration between key systems 5.2.2 Extend ePlanning across complete planning journey
5.3	**Adopt proven solutions**	5.3.1 Pilot self-service guidance tool 5.3.2 Evaluate proven back office integration approaches 5.3.3 Pilot AI-powered validation
5.4	**Build digital capability**	5.4.1 Build multidisciplinary digital capacity 5.4.2 Mandate regular user testing 5.4.3 Create feedback loops between users and system owners

R5.1 Urgent Technical Interventions

R5.1.1 Implement critical ePlanning fixes

Resolve critical issues including batch upload capability, resume functionality, progress saving and file size handling. The coordination authority should direct ePlanning to prioritise these fixes, with a defined timeline and public progress reporting.

R5.1.2 Establish dedicated user support

Establish a dedicated support function with visible issue tracking and resolution. Public reporting demonstrates responsiveness whilst building user confidence.

R5.1.3 Create system status transparency

Implement a public status page and notification system, standard practice in modern digital services.

R5.2 System Integration Programme

R5.2.1 Achieve integration between key systems

Enable automatic data exchange between ePlanning, local authority back-office systems and An Coimisiún Pleanála. This should be delivered as part of the LGMA National Planning Project with the aim that data entered once flows automatically to all systems requiring it.

R5.2.2 Extend ePlanning across complete planning journey

Extend the platform to encompass pre-application through discharge of conditions including join up with An Coimisiún Pleanála for decision making, creating seamless workflow across all nine stages. This should be a requirement of the LGMA National Planning Project, with phased delivery starting from the stages with greatest impact on processing time.

R5.3 Test and Adapt Proven Approaches

R5.3.1 Pilot self-service guidance tool

Pilot a self-service guidance tool, drawing on proven international models, to help applicants understand requirements before submission. A ‘do I need planning permission’ self-service feature should be prioritised.

R5.3.2 Evaluate proven back-office integration approaches

Evaluate open-source and proven back-office integration approaches used internationally against Irish requirements. Piloted implementation can demonstrate benefits before wider rollout, consistent with the approach under R5.3.1.

R5.3.3 Pilot AI-assisted validation

Pilot AI-assisted tools that can identify common completeness issues, suggest missing information and flag potential problems before submission.

R5.4 Build Digital Capability to Deliver

R5.4.1 Build multidisciplinary digital capacity

Establish the multidisciplinary digital capability needed to deliver digital transformation of the planning application process, including user experience designers, technical architects and service designers working alongside planning professional.

R5.4.2 Mandate regular user testing

Test changes with actual users before deployment, preventing the introduction of new problems.

R5.4.3 Create feedback loops between users and system owners

Regular user panels, satisfaction surveys and usability testing to inform continuous improvement.

7. Conclusion

This research set out to examine Ireland's planning application process from the perspective of those who use it daily to deliver housing, mapping the end-to-end user experience, identifying barriers and delays and providing actionable insights for reform. No research had previously examined how the whole process functions from a user perspective, across all stages.

Across 966 individual responses, planning officers, housebuilders and consultants independently identified the same problems and arrived at similar conclusions about what needs to change. The research revealed that failures at early stages cascade and multiply through later stages. The pre-application failure cascade documented in Section 2.2 shows how an eight-week process becomes twelve to eighteen months. Root cause analysis traced all five strategic challenges back to the same structural gap identified in Section 5.3: the absence of ownership, shared outcomes and a public service approach. Without addressing these together, reforms will continue to reproduce the fragmentation they seek to resolve.

The cost of inaction falls on everyone. Planning officers work under impossible pressure with insufficient support. Developers carry mounting finance charges that ultimately pass to homebuyers. Families wait for homes the system is too slow to deliver. Government invests in reform after reform without results changing on the ground. As one participant put it: "Everyone wants improvement, no one has authority to deliver it."

The five reforms presented in this report are interconnected, not a selection of options. Reform 1, establishing ownership and aligning the system around a shared outcome, is the critical enabler on which the other four depend.

There is reason for optimism. Ireland has the ingredients to succeed: willingness across all parties, a system small enough to coordinate with 31 authorities, an established national platform through ePlanning and the principles set out in the Digital Ireland Framework. The window is also extraordinary. Multiple reform processes are converging simultaneously in a way that will not recur for a generation: the commencement of the Planning and Development Act 2024, the transition to a new development plan cycle and the LGMA National Planning Project. The evidence is clear, the consensus exists and the path forward is set out in this report.

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Appendix 1: Quantified Impacts

This appendix provides the calculations and methodology supporting the quantified impacts presented in Section 2.3 and the gap analysis in Section 5.1.1. What follows is a summary of the underpinning data sources, assumptions and step-by-step workings. All calculations use permitted application 2023 data from the Central Statistics Office (CSO) and Local Government Salary Scales October 2023.

A1.1 Site Visit Resource Analysis

The planning process requires two site visits per application: one to verify the public site notice has been erected and one for the case officer's assessment. User research found that planning officers typically conduct both visits themselves. Users considered that two visits did not add any value to the process. The purpose of this assessment was to understand the cost of the visits. The Executive Planner grade was used for the calculations. This was considered appropriate as it represents the middle tier of staff qualified to conduct site visits. The mid-point of the pay scale (€61,603 p.a.) is used. This is a conservative estimate given subsequent salary adjustments.

Table 30: Site Visit Cost Calculation (CSO, 2023 (BHA03))

Step	Value	Source
Total planning applications (2023)	25,226	CSO, 2023
Site visits per application	2	User research finding
Total site visits conducted	50,452	25,226 × 2
Average time per visit (incl. travel)	2.25 hours	User reported average
Total hours annually	113,517	50,452 × 2.25
Executive Planner hourly rate	€46.43	LG Salary Scales 2023 (mid-point)
Total annual cost	€5,271,144	113,517 × €46.43

Table 31: Resource Impact

Measure	Value
FTE positions consumed (1,330 productive hours p.a.)	85 FTE
Cost per application	€209
Potential saving from single combined visit (50%)	€2,635,572 / 42.5 FTE freed

A1.2 Planning Application Workload, Housing Output and Fee Income

55% of planning applications concern householder (extensions and alterations) and one-off housing. Together these deliver just 12% of new housing units and generate approximately 20% of fee income.

CSO data classifies planning permissions by both construction type (new build, extension, alteration/conversion) and functional category (dwelling or non-dwelling), making it possible to identify dwelling-related activity across all categories (CSO, 2024a). This analysis examines the relationship between application volumes, housing output and fee income to identify where efficiency potential may be greatest.

Ireland does not currently track planning officer capacity by application type at local authority level. It is therefore not possible to confirm what proportion of the 31 authorities' combined resources is consumed by householder and one-off applications. The evidence shows there is significant potential for efficiency gains by targeting householder and one-off applications.

Table 32: Where Applications Go vs Where Housing Comes From (2023)

Category	% of all applications	% of new housing units delivered

Householder and one-off housing (dwelling extensions, dwelling alterations/conversions, one-off houses)	55% (13,978)	12% (5,032 units)
Multi-unit developments (housing estates, apartments)	5% (1,290)	88% (36,190 units)
Non-residential and other	40% (9,958)	—

Source: CSO Planning Permissions Q1–Q4 2023. Housing units: CSO BHA14 (CSO, 2023 and 2024).

Over half of all planning applications concern householder or one-off housing. Together these deliver just 12% of new housing units. By contrast, 5% of applications deliver 88% of new housing. In England, householder applications are estimated to consume approximately 50% of planning officer capacity and are being actively targeted for efficiency gains through automation and digital services (DLUHC, 2024). If Ireland's capacity profile is comparable, the efficiency opportunity is substantial.

Table 33: Estimated Application Fee Income by Category (2023)

Category	Applications	Est. fee income	% of est. fee income
Householder and one-off	13,978 (55%)	€631,000	**20%**
Multi-unit developments	1,290 (5%)	€2,352,000	**75%**
Non-residential and other	9,958 (40%)	Variable	5%

Note: Estimates based on fee rates in Table 36. Actual income varies by scheme size. Non-residential fees are area based and not estimated here. Source: Planning and Development Regulations 2001, Schedule 9 (Government of Ireland, 2001).

The category that accounts for 55% of applications and 12% of housing output generates approximately 20% of fee income. Multi-unit developments that deliver 88% of new housing generate approximately 75%. The fee structure does not recover the resource cost of processing householder and one-off applications. In practice, fee income from multi-unit developments cross-subsidises the processing of lower-output application types.

Table 34: Detailed Application Breakdown (2023)

Application type	Permissions	% of total
Dwelling extensions	6,072	24%
Dwelling alterations/conversions	2,874	11%
One-off houses	5,032	20%
Householder and one-off subtotal	**13,978**	**55%**
Multi-development houses	541	2%
Apartments	749	3%
Multi-unit subtotal	**1,290**	**5%**
Other new construction (non-residential)	7,714	31%
Non-dwelling extensions and alterations	2,211	9%
Communal dwellings	33	<1%
Total	**25,226**	**100%**

Source: CSO Planning Permissions Q1–Q4 2023 (CSO, 2023a; 2023b; 2023c; 2024a).

Table 35: Housing Units Delivered by Application Type

Application type	Units permitted	% of total units
One-off houses	5,032	12.2%
Multi-development houses	14,706	35.7%
Apartments	21,487	52.1%

Total	**41,222**	**100%**

Source: CSO Planning Permissions Granted for New Houses and Apartments 2023, BHA14 (CSO, 2024b).

Table 36: Planning Application Fee Schedule (Selected Categories)	
Class of development	**Fee**
Domestic extension or alteration	€34 per application
New dwelling (including one-off house)	€65 per dwelling unit
New apartment	€65 per dwelling unit
Commercial development	€3.60 per sqm (€80 minimum)
Agricultural building	€80 minimum

Source: Planning and Development Regulations 2001, Schedule 9 (Government of Ireland, 2001).

A1.3 Further Information (FI) Request Impact Analysis

User research found that FI requests have become routine rather than exceptional. Housebuilders and planning consultants consistently reported that approximately 90% of housing applications receive FI requests, adding approximately six months to processing timelines.

The 90% FI rate was reported by professional participants: housebuilders, planning consultants and housing developers who predominantly work on multi-unit housing developments (housing estates and apartment schemes) rather than individual one-off houses. This analysis therefore applies the 90% rate to multi-unit developments where the evidence directly supports it and a conservative 10% rate to one-off houses where the research did not directly evidence the FI rate.

Table 37: Housing Application and Unit Breakdown (2023)			
Application Type	**Applications**	**Units Permitted**	**% of Total Units**
One-off houses	5,032	5,032	12.2%
Multi-development houses	541	*	
Private flats / apartments	749	*	
Multi-unit combined	1,290	36,190	87.8%
Total	6,322	41,222	100%

Table 38: Estimated Housing Units Affected by FI Delays				
Segment	**Units**	**FI Rate Applied**	**Units Affected**	**Basis for Rate**
Multi-unit developments	36,190	90%	32,571	Direct user evidence
One-off houses	5,032	10%	503	Conservative estimate
Total units affected	41,222		33,074	

*Source: CSO Planning Permissions Granted for New Houses and Apartments 2023 (BHA14). *Multi-development and apartment unit counts are derived: 41,222 total units minus 5,032 one-off houses = 36,190 units.*

Table 39: Timeline Impact			
Measure	**Statutory**	**Actual with FI**	**Multiplication**
Pre-application to decision	12 weeks	38 weeks	3.2×
Additional delay per FI	—	6 months	User reported

An estimated 33,000 housing units are subject to FI-related delays of approximately six months annually. This conservative estimate applies the user-reported 90% FI rate only to multi-unit

developments where the evidence directly supports it and a 10% rate to one-off houses. Even at these conservative rates, the impact on housing delivery timelines is substantial.

Sources: CSO 2023 (BHA14); User research interviews.

A1.4 Digital System Inefficiency

Users reported severe operational difficulties with the ePlanning system, particularly around document uploads, resulting in application invalidations and processing delays.

Table 40: Digital System Delay Calculation

Step	Value	Source / Notes
Total planning applications (2023)	25,226	OPR, 2023
Conservative impact rate	10%	Likely understated
Applications affected	2,523	25,226 × 10%
Average delay per affected application	1 day (upload)	User reported
Additional delay per invalidation	3-5 days	User reported
Annual avoidable delay	10,000+ days	Combined upload + invalidation

Table 41: Administrative Cost of Invalidations

Step	Value	Source / Notes
Applications invalidated (technical issues)	2,523	As above
Officer time per invalidation	4 hours	User reported
Hourly rate (Executive Planner)	€46.43	LG Salary Scales 2023
Annual administrative cost	€468,578	2,523 × 4 × €46.43

A1.5 Summary of Quantified Impacts

Table 42: Summary of Quantified Impacts

Measure	Impact	Section
Duplicate site visit cost	€5.3 million p.a. / 85 FTE	A1.1
Potential saving (single visit)	€2.6 million / 42.5 FTE freed	A1.1
Not clear where limited local authority capacity is going	55% of applications deliver 12% of housing and generate 20% of fee income	A1.2
FI rate (housing applications)	Up to 90% affected	A1.3
Housing units delayed by FI	33,000 units p.a.	A1.3
Digital system delays	10,000+ avoidable days p.a.	A1.4
Digital system admin cost	€468,578 p.a.	A1.4

These figures represent directly quantifiable costs identified through the research. They exclude the broader economic costs borne by housebuilders, planning consultancies and applicants through additional finance charges, bespoke template creation for each of the 31 local authorities and time lost navigating inconsistent local requirements. These unquantified costs are documented in the main report.

Appendix 2: Public Service Delivery Theory

The report applies public service design theory to understand the planning application process and identify opportunities for improvement. The theory provides the analytical framework through which the research findings in Chapters 2 to 6 are interpreted and directly informs the reform proposals. Each section below summarises a key theoretical concept and explains how it connects to the evidence presented in this report.

A2.1 Understanding the Planning Application Process as a Service

A public service can be defined as the thing or things that the public interacts with to get an outcome (Pope, 2024). It describes what someone actually wants to do, for example get planning permission and includes all the steps and things involved between users and providers to get there (Tarling, 2023). Ireland's planning application process fits this definition: the planning applicant engages with a process set up by government through legislation and guidance, facilitated by local planning authorities' processes, officers and systems, ePlanning and often by An Coimisiún Pleanála, to get planning permission to develop.

Scholars have long recognised that public services should be designed around what the people who use them need in the first instance. It is widely understood that people experience services as whole or complete journeys (Stickdorn & Schneider, 2011). This is why the research adopted user journey mapping across nine stages, to understand how users experience the planning application process end-to-end. Effective public services share common characteristics: they are user-focused, simple to navigate, quick to deliver outcomes, transparent in process and consistent in application (Downe, 2020; Tarling, 2023; Pope, 2024).

Yet traditional public administration often creates services reflecting existing legislation, established practice and administrative functions, rather than user journeys. This forces those who want to use the service to navigate organisational and procedural complexity to achieve simple outcomes (Osborne, 2010). When services fragment across organisational boundaries without coordination, users and the wider public bear the cost burden of failures (Downe, 2020; Tarling, 2023; Pope, 2024). As documented in Sections 2.3 and 4.2, this is the situation across Ireland's 31 planning authorities, where users navigate different procedures for identical application types and absorb the costs of a service that is not designed around their needs.

A2.2 Process versus Service: Why it Matters

The distinction between ‘process’ and ‘service’ is fundamental. A process focuses on internal administrative requirements: forms completed correctly, procedures followed, deadlines met. A service focuses on helping users achieve their goal or outcome (Pope, 2024; Tarling, 2023). The research findings in Section 5.3 suggest that Ireland's planning application process currently operates as the former rather than the latter.

Greenway et al. (2018) argue that public service failures result from focusing on government-led policy and processes over user-focused delivery and service. Maltby (2017) observes that government suffers from ‘very, very poor connections between policy advice and delivery experience’ and what is neglected is the ability to translate policy intent into services that work for users. The gap between Housing for All's ambitions and the operational reality documented in Section 5.1.1 illustrates this disconnect in the Irish context.

The recommended remedy is to shift from ‘the strategy’ to ‘delivery’ and an outcome focus. For planning applications, which means focusing on providing applicants with what they need to get planning permission, as simply and quickly as possible. Improving how services function, operate and perform to deliver this outcome should be the ultimate focus of all participants and parts of the system (Pope, 2024; Tarling, 2023; Greenway et al., 2018; Maltby, 2017).

This echoes the principle set out in The Digital Framework (2021) that asserts for government to deliver effective change it requires ‘building services that meet the needs of your users rather than

internal organisational requirements'. Reform 1 (Section 6.1) applies this principle to the Irish planning application process.

A2.3 The Coordination and Measurement Challenge

Tarling (2023) argues that improving services requires changing how organisations such as government work. It is not just fixing individual processes but instead considering the whole, together rather than considering fragments in isolated silos. To do this there needs to be a shared language across users and organisations, the authority to coordinate and common objectives. This is required to ensure that teams that support different stages of the users' journey, who 'may have never worked together before and may have different ways of describing their work', can work together to make systematic improvement possible. Ireland's 31 planning authorities currently operate without any of these conditions, as documented in Section 5.1.1, which is why the meta challenge identified in Section 5.3 places coordination and ownership at the centre of the reform programme.

Addressing the coordination challenge also requires addressing the measurement challenge. Organisations need to move from measuring administrative outputs to service outcomes, measuring 'the actual thing that you want to make happen' (Tarling, 2023). It is only by doing this that government and the public can understand if services and the stages and activities in between, are achieving their purpose (Pope, 2024; Tarling, 2023; Greenway et al., 2018; Maltby, 2017). As Section 5.1.3 documents, this measurement infrastructure does not yet exist for the Irish planning application process: there is no end-to-end performance framework, no standardised reporting and no comparable data across authorities.

A2.4 Digital as Enabler, Not the Solution

Pope (2024) considers that to deliver the next generation of public services, we need to move past seeing digital and technology as something new and novel that is 'othered'. He argues that in this digital age, it should be considered an enabler to delivering ease and effectiveness for the public, in ways we could not have thought possible before.

Embracing this potential requires a shift from process focused to service focused thinking. Rather than asking 'how do we digitise our existing process?', service thinking requires asking, 'what does the user need to achieve and how can we make that simple?' (Pope, 2024). This distinction explains why digitising fragmented processes does not result in transformative change, but can in fact make things worse, speeding up dysfunction rather than eliminating it. Digitising fragmentation creates digital fragmentation (Pope, 2024; Tarling, 2023; Greenway et al., 2018). The findings in Sections 4.2 and 5.2.2 suggest ePlanning demonstrates this risk: it has digitised existing fragmentation rather than transforming the underlying service.

Pope (2024) considers that the power of digital to truly transform public services takes effect when it is focused on eliminating administrative burdens for all users. Herd and Moynihan (2018) define the impact of administrative burden on service users as comprising learning costs (knowing that a service exists), compliance costs (the effort required to follow the rules, including filling out forms, attending assessments, providing evidence and updates) and psychological costs (how the experience of using a service makes people feel). All three are evident in users' experience of the planning application process, particularly at the submission stage (Section 2.1). Pope argues that these burdens can be identified and eliminated through digital transformation that enables what he terms 'proactive rather than reactive' service delivery where 'it is the service that does the work' rather than forcing the public to navigate complex processes.

But achieving this requires a willingness and openness to embracing entirely new service models and addressing what Maltby (2017) and Tarling (2023) recognise as the 'underlying organisational conditions' of governance, funding and operational structures that determine how services function. Without organisational transformation, digital investment merely accelerates the outcome of existing problems rather than addressing them wholesale. Reform 5 (Section 6.5) addresses this for the Irish planning application process.

Appendix 3: International Examples and Lessons Learned

The main report identifies the absence of strategic ownership, standardised processes and integrated digital systems as the root causes of planning application inefficiency (Chapter 5) and proposes five reforms to address them (Chapter 6). This appendix examines two international programmes that have combined digital transformation with planning reform, England's Digital Planning Programme and the Netherlands' Environment and Planning Act, to understand what has been built, what has worked and what has not, and to draw out what Ireland could do with what now exists.

A3.1 England's Digital Planning Programme

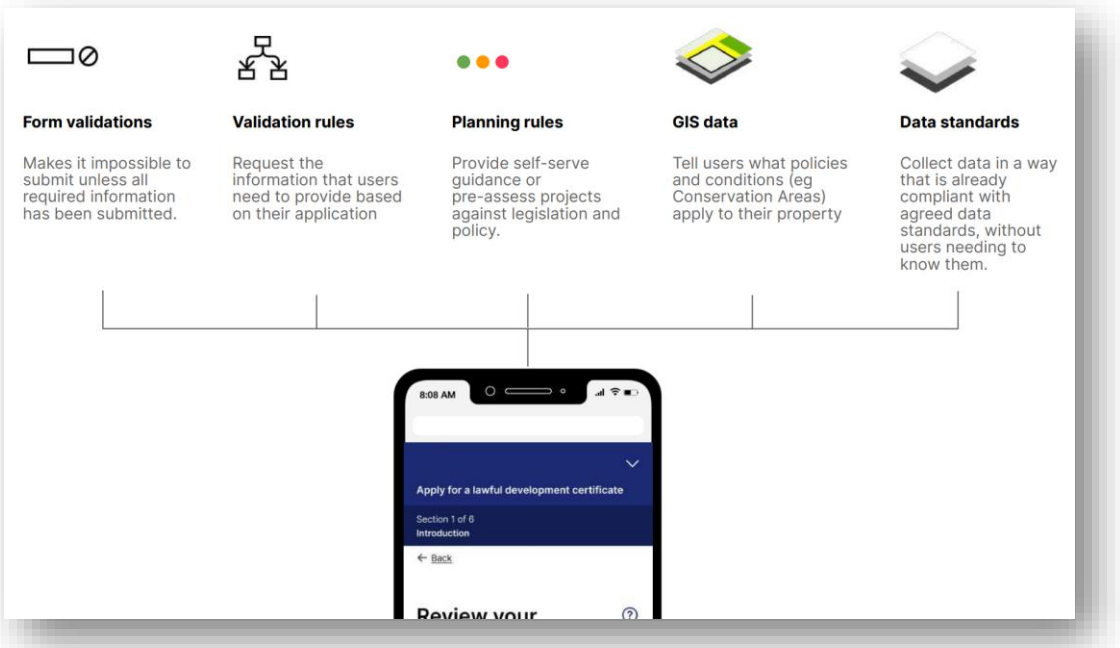
Approach

The Digital Planning Programme launched in 2018, adopting a market-led, decentralised model. Digital tools were developed in partnership with local authorities and private sector suppliers, released as open-source software and made available for councils to adopt voluntarily. This delegated take-up to 337 local planning authorities, each with different legacy systems, contractual arrangements with software providers and levels of digital capability.

Products and Results

Development management software for local planning authorities. The programme's principal development management products are PlanX and BOPS, which together cover the front-end and back-office of the planning application process. PlanX, developed by Open Systems Lab in collaboration with a number of UK councils, uses plain English questions to guide applicants' step by step, with rules-based logic determining what information is needed based on previous answers. Key features include a 'find out if you need planning permission' self-service and built-in validation preventing incomplete submissions. BOPS (Back Office Planning System) handles the processing workflow for local authority planners, automating routine tasks including matching legislation to application types, suggesting consultee lists and identifying relevant planning policies. It integrates directly with PlanX for receiving applications. Figure 8 illustrates the principles behind this operation.

Figure 7: *Digital solution that aims to make routine planning applications simple (Open Systems Lab, 2023).*



The programme's code is publicly available, but the software suppliers who develop and maintain these tools, including Open Systems Lab and Unboxed, provide design, development and ongoing support on a commercial basis. Open source in this context does not mean adoption without cost or commercial engagement.

Where implemented, the tools deliver measurable improvements:

- Lambeth Council reported that 82% of applications submitted through PlanX were valid upon receipt, compared to 33% previously. When combined with BOPS, overall processing time reduced by 40%. 50% of Lambeth residents chose to use the PlanX service to submit directly to the council (PlanX, 2025)
- Camden Council reported a 60% reduction in planning duty calls following the introduction of its 'find out if you need planning permission' service, allowing the removal of the duty planner service entirely (Camden Council, 2025)
- Doncaster Council reported a 16% increase in revenue from its Lawful Development Certificate service as users were guided to the correct service (PlanX, 2025)
- Buckinghamshire Council reported a 33% decrease in overall enforcement reports and Medway Council an 83% reduction in unnecessary enforcement reports, after implementing PlanX's 'Report a Breach' service (PlanX, 2025)
- Southwark Council reported a 30% reduction in the time required to assess applications using BOPS (Open Digital Planning, 2025)

Data infrastructure: 'Planning data you can find, use and trust'. Without standardised data, none of the other tools can function: PlanX needs to know if a site is in a conservation area; BOPS needs standardised policy data; AI tools need structured inputs. Standardised data is what makes it possible to deliver a consistent service across multiple authorities, build self-service tools, automate validation and measure whether the service is achieving its outcome. The Digital Planning Data team has designed data standards collaboratively with the planning community and the Planning Data Platform (planning.data.gov.uk) now hosts over 400 datasets attracting 1.2 million weekly visitors (MHCLG Digital, 2025). Pope (2025) has highlighted the platform as an exemplar for government digital infrastructure.

AI and data extraction. The programme is also developing centrally procured AI products designed for deployment across the system (UKAuthority, 2026). AI Extract aims to convert historical planning documents including paper maps, scanned PDFs and filing cabinet records into structured digital data. Early results suggest it can reduce tasks taking planning officers 1 to 2 hours to under three minutes at approximately 10p per document (MHCLG Digital, 2025). The programme, in partnership with the Incubator for AI within the Department for Science, Innovation and Technology (DSIT), hopes to begin a piloted release from 2026 onwards.

In February 2026, MHCLG awarded a £6.9 million contract to Google Cloud to develop an AI-powered tool to support planning decision making, starting with householder applications which represent 69% of all planning applications, with the aim of reducing decisions from 8 weeks to circa 4 weeks and a long-term vision of near-instant decisions for straightforward applications.

Legal powers. The Levelling Up and Regeneration Act 2023 (LURA) introduced powers that did not previously exist. Sections 84 to 88 give the Secretary of State power to set planning data standards, mandate how planning authorities process and publish planning data and require the use of approved planning data software (Foot Anstey, 2023). These provide the legal mechanism to mandate digital standards, though the regulations giving effect to them have not yet been made.

Community and transparency. The Open Digital Planning community has grown to nearly 200 local planning authorities (MHCLG Digital, 2025), though participation does not equate to adoption of the tools. The programme publishes progress openly through monthly show-and-tell sessions, its blog and GitHub discussions (Open Digital Planning 2025), reflecting the UK Government's Service Standard requirement for public progress-sharing (Government Digital Service, 2025) and the principle that transparent development builds both better outcomes and the trust needed for adoption (Greenway et al., 2018; Tarling, 2023).

The Scaling Lesson

Despite these results, wider adoption has been limited. A Planning Resource investigation in November 2025 found that close to £100 million had been spent on the programme over six years. The delivery model placed the burden of publishing data to national standards on each individual

authority, supported by £50,000 and specialist guidance and support. After four years, coverage remains thin: conservation areas, the most complete dataset, has data from 120 of 337 authorities; tree preservation orders has just 45. Of England's 337 local planning authorities, 20 had run services using PlanX. Across the 19 pilot authorities surveyed, 125 real-world uses of BOPS had been recorded (Gardiner, 2025).

The gap between what has been built and what has been adopted is explained by specific structural constraints, most of which Ireland either does not face or has the opportunity to avoid.

Local authority capacity. RTPI research found that net local authority expenditure on planning in England fell by 43% from 2009/10 to 2020/21, from £844 million to £480 million, leaving planning representing just 0.45% of local government budgets (RTPI, 2022). The number of public sector planners shrank by a quarter over the same period and 97% of planning departments report skills gaps (RTPI, 2023; RTPI, 2025). Authorities under this level of pressure do not have the capacity to simultaneously adopt new tools, transform their processes and publish their data to national standards.

Scale and fragmentation. 337 local planning authorities each operate different systems, different processes and different contractual arrangements with software providers. The programme asked each authority to individually procure, implement and operate new tools within this fragmented landscape. No mechanism existed to coordinate adoption at system level.

Commercial barriers and inaccessible data. The Planning Portal, through which approximately 90% of planning applications are submitted, was established by government in 2002 but privatised in 2015 as a joint venture between MHCLG and TerraQuest Solutions (Gov.UK, 2015). Government cannot simply mandate changes to how data is structured or shared through the Portal. The proprietary software market that serves local authorities creates further barriers: each supplier holds data in different formats and switching costs are significant.

Political instability. Between 2018 and 2026, England had 5 Prime Ministers, 8 Secretaries of State for Housing and approximately 10 Housing and Planning Ministers. No one stayed long enough to confront the fundamental question of why 337 authorities were each individually administering what is essentially the same process. The legal powers to mandate now exist through LURA, but they have not been exercised. The tools work. The data methodology is sound. The building blocks are accumulating including legal powers, data infrastructure, a growing community and centrally procured AI. However, the system cannot transform itself one authority at a time within these structural constraints.

A3.2 The Netherlands: Consolidating and Simplifying

Approach

The Netherlands began with the outcome, faster, simpler, cheaper planning decisions and designed the solution around achieving it operationally. The answer required both legislative reform and a national digital platform, conceived together as a single programme.

What Has Been Done and What It Has Achieved

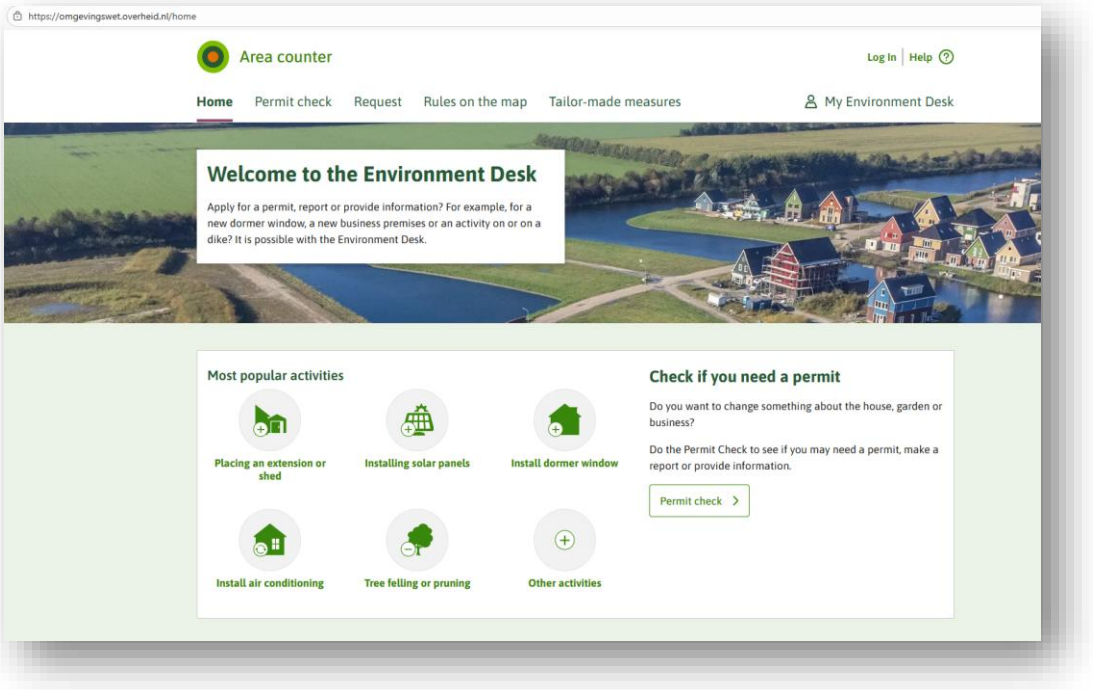
Legislative consolidation. The Environment and Planning Act (Omgevingswet), signed into law in 2016, asked a basic question: if 342 municipalities are each administering broadly the same processes under separate legislation, why is this done differently everywhere? The answer was wholesale consolidation. The Act combined 26 separate laws into a single integrated framework, reduced 60 Orders in Council to 4 and narrowed 75 ministerial regulations to one (Louwsma, 2018). It removed structural duplication and waste at source.

The national platform. The Act mandated a single national digital platform, the Omgevingsloket (Environment Desk), as the sole point of access for all planning applications, rules and information. Adoption was not voluntary; it was a legal requirement. Every municipality uses the same system.

The Omgevingsloket provides integrated, location-based information and services. Users can check whether proposed work is allowed, view the rules that apply at a particular location and apply for permission. The system connects national, provincial and municipal government in a single digital environment, with the capacity to automate routine decision making using rules-based logic. Governments are required to respond to applications within 8 weeks.

The combination of legislative consolidation and the digital platform reduced standard planning timelines from 26 weeks to 8 weeks, a 69% reduction in processing time (Louwsma, 2018). Every municipality adopted the platform because legislation required it. Figure 9 shows the public-facing view of the platform, where applicants can check if they need permission and apply directly.

Figure 8: *The public facing view of the Netherlands national Omgevingsloket Platform, where applicants can check if they need permission and apply directly*



The Implementation Lesson

The Dutch government took ownership of the outcome for all users, mandated a national system and held that position through significant political opposition including a Senate majority vote against proceeding. The legislative consolidation, bringing 26 laws into one platform with one set of rules, directly addressed the fragmentation that undermines consistency and simplicity.

The delivery approach was to build the complete system before launching it nationally. The Act was signed into law in 2016. The system went live on 1 January 2024, eight years later, after multiple postponements because the digital system was not ready and administrative authorities needed more time to prepare (Yearbook of International Environmental Law, 2024).

Because everything launched simultaneously, problems that would have been identified and resolved through phased release surfaced at scale. Municipalities needed workarounds. By late 2024, two out of three had to fall back to using the old standards (Gemeente.nu, 2024). Basic usability issues, such as applicants not being required to provide contact details, required legislative changes to fix. Core functionality was still being resolved two years after launch (IPLO, 2026). The Act is being monitored by an evaluation commission reporting annually through 2027, with a comprehensive assessment due in 2028 (Yearbook of International Environmental Law, 2024).

The legislative principle and the political leadership were sound. The delivery would have been faster and smoother had it been developed and released incrementally, with each stage tested with real users, problems resolved before the next stage and value delivered at each step rather than delayed until everything was ready. This is the specific delivery lesson for Ireland: take the ambition and the mandate, deliver it step by step.

A3.3 What This Means for Ireland

Ireland's Starting Position a Big Advantage

Ireland has practical advantages that make this achievable in a way that was not straightforward for either England or the Netherlands. Section 5.1.1 of the main report sets out Ireland's structural

advantages in detail: 31 authorities rather than hundreds, ePlanning as a publicly owned national platform, existing data assets including GeoHive and the GZT and enforcement powers through National Planning Statements. These advantages directly shape what is achievable. The question is how Ireland adapts and applies the international approaches described above.

A National Service, Not 31 Individual Systems

England has demonstrated that local authorities can use digital tools to significantly improve planning application processing. The reason the results have not scaled to all local authorities is equally clear.

Ireland does not need to repeat this pattern. Rather than making tools available for 31 authorities to each decide whether to adopt, these capabilities could be delivered as national services through ePlanning, ingrained in the system itself, not an optional addition to it. An applicant in Cork would have the same guided experience as an applicant in Donegal. A planner in Galway would use the same back-office tools as a planner in Dublin. Ireland's task is not to invent these tools but to adopt and adapt proven approaches as part of a centrally delivered service.

The Legislative Principle: Standardise the Routine, Focus the Expertise

Ireland's 31 authorities each operating different administrative procedures for the same application types is the same structural problem the Netherlands identified across its 342 municipalities. A significant proportion of planning applications in Ireland are likely to be routine in nature like householder extensions and changes of use within compatible categories. As is the case in England where householder applications represent more than 50% of the total. These applications require the same assessment against the same types of constraints. There is no reason for the process, the validation requirements, the consultation procedures, or the decision framework to differ between authorities for these application types.

Standardising the routine nationally does not diminish local planning. It does the opposite. When planners are no longer spending time on administrative processes that could be automated and standardised, their expertise is freed for the work that genuinely requires professional judgment: complex developments, placemaking, design quality, community engagement, negotiation on conditions, enforcement. This is Reform 1's coordination authority in practice: ownership of the outcome, with local expertise directed where it adds most value.

The Data Foundation

None of the above is possible without standardised planning data. Every tool described in this appendix depends on consistent, structured data to function. As Section A3.1 demonstrates, England's delivery model placed the burden on individual authorities and coverage remains limited after four years. Ireland can learn from the methodology without repeating that model. Appendix 4 explores this in more detail.

Tackle the Disconnect Between Operation and Legislation

Neither England or Netherlands has closed the loop between delivery and legislation. The Netherlands redesigned legislation but delivered a whole digital solution first instead of testing and releasing gradually through small scale iterations. England iterates digitally but at present does not appear to be reshaping the legislation through an effective feedback loop to bring the practical lessons from the real world to bear. Ireland has the opportunity to build this connection from the outset through the coordination authority proposed in Reform 1 (Section 6.1, R1.4.3). This is what would make Ireland's approach different from either international example.

A3.4 Applying the Learnings: Potential for Ireland in Five Years

If Ireland takes the Dutch ambition on legislative standardisation, applies it through its existing enforcement mechanisms, delivers it incrementally using the tools and methods that England has proven and builds the data foundation set out in Appendix 4, the planning application process in five years could look fundamentally different from today.

A significant proportion of applications would be processed through a national system with near-automated decision making for straightforward cases. An applicant would receive clear, plain-language guidance on what is needed before they apply. Their submission would be validated automatically against standardised requirements, preventing incomplete applications from entering the system. Constraint checking against zoning, heritage, flood risk, ecology and other designations would be automated using nationally standardised data. Where an application meets all requirements,

the decision could be near instant. Where it does not, it would be routed to a planner with all the relevant information already assembled.

The service would be consistent regardless of which local authority area the application falls in. Planning data would be standardised, open and maintained as a national asset, available not just for processing applications but for regulatory oversight, policy monitoring, climate action assessment and public engagement. Planners could spend their time on complex developments, placemaking, design negotiation, community engagement and enforcement, the work that requires professional expertise.

This is achievable within a single programme of reform. The tools exist. The legislative mechanisms exist. The institutional infrastructure exists. The scale of the system, 31 authorities, not 300 plus, makes it manageable. The convergence of the Planning and Development Act 2024, the new development plan cycle and the urgency of housing delivery creates a compelling case for acting now. Appendix 4 (Section A4.6) sets out why this window matters.

Both international programmes continue to evolve. England's Google AI contract and growing ODP community signal a potential shift potentially towards a more central delivery, which could achieve scaling. The Netherlands' evaluation commission will report annually through 2027 with continued improvements anticipated. Ireland should actively monitor both. But the opportunity is not to wait for either country to finish. It is to learn from what they have already demonstrated and avoid the specific constraints that have slowed them.

Appendix 4: Planning Data Standards for Ireland

The main report identifies the absence of standardised planning data as a critical barrier to digital transformation (Sections 5.1.1 and 5.2.2) and proposes establishing a national data foundation as part of Reform 1 (R1.4). This appendix sets out the detailed case and strategy for doing so. It builds on the comparative analysis of international digital planning programmes set out in Appendix 3.

A4.1 Ireland's Good Foundation

Ireland has built a strong geospatial data infrastructure. This is an important asset and a genuine advantage over many comparable countries. This includes:

- **GeoHive:** state's national geospatial data hub and was developed by Tailte Éireann. It provides open access to spatial data and brings datasets, web services and maps from across the public sector together to a single portal. It's built on Esri's ArcGIS and operates on a federated model: each public body owns and manages their own data, which GeoHive then makes accessible.

  A range of national organisations provide spatial data essential to planning decisions. These include SAC, SPA and NHA datasets from the National Parks and Wildlife Service (NPWS); CFRAM flood mapping from the Office of Public Works (OPW); the Record of Monuments and Places from the National Monuments Service (NMS); architectural heritage data from the National Inventory of Architectural Heritage (NIAH); environmental datasets from the Environmental Protection Agency (EPA); and geological datasets from Geological Survey Ireland (GSI).
- **MyPlan.ie:** this is the national hub for planning geospatial data. It hosts planning application data. It also hosts Generalised Zoning Types (GZT) layers from all local authority Development Plans and Local Area Plans. The GZT's have been created through a consistent data scheme across all local authorities (MyPlan.ie, 2023). This is a significant achievement and an important precedent for the data standards work proposed in this appendix.
- **Open Data Licensing:** the government uses CC-BY, which is an open licence and means the data is made open format by default. This approach gives Ireland a structural advantage over England, where Ordnance Survey's commercial licensing model created years of tension before key datasets were released under the Open Government Licence.
- **International Standards Compliance:** Ireland's geospatial infrastructure complies with key international standards including the EU INSPIRE Directive, OGC GeoSPARQL vocabularies and the WGS 84 coordinate system. The Irish Spatial Data Infrastructure (ISDI) project provides a framework for online sharing of spatial data across public bodies. Data is also published as Linked Data through a collaboration between Tailte Éireann and the ADAPT research centre.

A4.2 England's Comparative Context

England provides a direct comparator for Ireland, both because of shared planning traditions and because it has been grappling with the same data fragmentation problem, albeit at a larger scale.

- **The UK's Geospatial Landscape Context:** the UK's Geospatial Commission was created in 2018 and works with six partner bodies including Ordnance Survey, HM Land Registry and the British Geological Survey to maintains a National Geospatial Data Standards Register covering identifiers, metadata, data formats, coordinate reference systems and data services, using the GEMINI metadata standard (the UK profile of ISO 19115).
- **The Problem of Fragmentation:** planning in England is devolved to over 300 different local planning authorities, each recording planning data in different formats such as planning decisions. With local authority planning officers regularly performing repetitive tasks like manually re-entering planning information into different parts of the process. The data is fragmented and majority of it is not accessible. It has taken the Digital Planning Programme significant effort to start to change this and support the publication of usable data made possible by planning data standards.
- **What the Planning Data Platform Does:** The planning.data.gov.uk platform, launched in 2022, collects planning and housing data from local planning authorities. It brings it together for use and to view in trusted public platform. The platform is open source, provides an API and makes data

available for download It defines data specifications for planning designations including Article 4 directions, brownfield land and conservation areas. It is designed to enable the PropTech sector to build services without expensive workarounds that scrape the data.

A4.3 The Gap: What is Missing

Local and Regional Authority Data Current Context

- **Local Authority Designations:** each local authorities produces a development plan containing spatial designations that inform planning decisions. These are created independently, with no common data schema, no shared vocabulary and no consistent publication format.
- **Land Use Zoning:** every local authority zones all land in its area. The GZT on MyPlan.ie provides a generalised national crosswalk, but it complements rather than replaces the statutory zoning. The detailed zoning categories that actually govern planning decisions vary from council to council. Dublin City Council has 14 zone types (Z1–Z15); Cork, Galway and Fingal each use different codes, names and definitions for equivalent concepts.
- **Architectural Conservation Areas:** under Section 81 of the Planning and Development Act, each development plan must designate Architectural Conservation Areas (ACAs). Some councils publish ACA boundaries as spatial data, most do not. It appears that there is no national ACA dataset and no common data schema.
- **Record of Protected Structures:** each planning authority maintains a Record of Protected Structures (RPS) as part of its development plan. There are over 40,000 Protected Structures nationally. Some councils publish their RPS digitally, others do not. Formats vary. It appears that there is no single national dataset.
- **Tree Preservation Orders:** local authorities can make Tree Preservation Orders (TPOs). Publication of TPO spatial data is entirely ad hoc, with some councils (such as Dún Laoghaire-Rathdown) publishing locations and most not. It appears there is no national TPO dataset.
- **Landscape Character Areas and Designations:** some authorities produce Landscape Character Assessments identifying distinctive landscape categories. Local authorities may also make landscape conservation area orders. The methodology, terminology and spatial data publication vary significantly across authorities.
- **Specific Development Objectives:** development plans contain site-specific objectives for particular areas (regeneration areas, opportunity sites, building height zones, view corridors, strategic development sites). Different councils use entirely different terminology: ‘Specific Development Objectives’, ‘Specific Local Objectives’, ‘Site Specific Zonings’, ‘Strategic Development and Regeneration Areas’, ‘Key Development Areas’ and so on. These are almost entirely locked in PDF documents and maps, with no consistent digital spatial format.
- **Other Local Designations:** additional designation types that vary in terminology and spatial publication include Decarbonisation Zones, green infrastructure corridors, ecological buffer zones, building height strategies, retail core areas and protected views and prospects.
- **Regional Designation:** Ireland’s three Regional Assemblies produce Regional Spatial and Economic Strategies (RSES) designating settlement hierarchies, growth centres, key towns, strategic corridors etc. These designations cascade into local plans but are expressed largely in PDF documents and static maps, not as standardised, machine-readable spatial datasets.

A4.4 The Cost of Inaction

The absence of standardised planning data is not merely a technical inconvenience. It has direct, measurable consequences including:

- **Planning Officer Time and Local Authority Resources:** Irish local authorities are under severe resource pressure. When a planner must manually check whether a site falls within an ACA, cross-reference the regional plan PDF etc. That represents hours of work per application that could be reduced to minutes with standardised, integrated data. England’s Digital Planning programme estimated a minimum 20% time saving for planning officers through automation. Applied to Ireland’s approximately 30,000 to 40,000 annual planning applications, even modest automation would free thousands of hours for complex casework, enforcement and plan making.
- **Regulatory Oversight:** The Office of the Planning Regulator (OPR) reviews every development plan for policy compliance. This task is made significantly harder when each of 31 plans uses

different data formats, mapping methodologies and levels of digital maturity. Standardised data would enable the OPR to monitor compliance programmatically, flagging inconsistencies automatically rather than discovering them through manual review of PDF documents. The same applies to the Regional Assemblies, which must ensure local plans align with the RSES.

- **Climate Action and Environmental Compliance:** Ireland has binding climate targets and EU environmental obligations. Planning is a primary lever for delivery. Currently, assessing the cumulative environmental impact of planning decisions nationally is extremely difficult because the data is fragmented. Standardised data would enable immediate answers to critical policy questions: how much land zoned for development falls within ecological buffer zones? What proportion of new housing permissions are in locations accessible by public transport? For Appropriate Assessment under the Habitats Directive, linked spatial data would allow screening to be partially automated, improving both speed and quality.
- **Marine Planning:** The Maritime Area Planning Act 2021 provides a new marine planning system built essentially from scratch. Marine protected area coverage must increase from approximately 2.1% to 30% by 2030. This is a unique opportunity to embed data standards before designations are made, rather than retrofitting them afterwards. If Ireland defines marine planning data specifications now, it avoids the current data fragmentation problem entirely. If it does not, it will face the same standardisation challenge later.
- **PropTech and Economic Innovation:** In England, the PropTech sector is growing rapidly, partly because planning.data.gov.uk provides standardised data to build on. Without equivalent standardised data, Irish companies face expensive and complex workarounds to scrape, acquire, or deduce planning data. This limits innovation, raises barriers to entry and means Ireland misses the economic value that a vibrant planning technology sector would generate.
- **Citizen Engagement and Trust:** When someone wants to know ‘what can be built near my home?’, the answer currently requires navigating multiple disconnected systems and reading PDF development plans. A standardised national platform with a constraints report for any site in the country would transform public access to planning information, building trust and improving the quality of public participation.

A4.5 What Data Standards Matter

This section sets out what data standards are in the context of planning and why they matter at the point where data is created

Where Planning Data is Created

When a local authority prepares or reviews a development plan, a GIS officer draws boundaries in GIS software (typically ArcGIS or QGIS), creating spatial layers: polygons for zones, polygons for ACAs, points or polygons for protected structures, lines for road objectives and so on.

At this moment, the GIS officer makes dozens of small decisions with significant downstream consequences: what to name the layer, what attribute columns to include, what values to enter, what coordinate system to use, what format to export and where (if anywhere) to publish the data. Without a standard, every council makes these decisions independently, creating 31 different versions of what should be the same dataset.

What a Data Standard Actually Is

A data standard is an agreed specification that defines if you are publishing this type of data, here is exactly how you must structure it. The principle behind a data standard is that of a *canonical register*: instead of the same data living in multiple places and multiple formats, it should be maintained once, authoritatively, with clear custodianship, appropriate licensing and designed for self-service access via standard formats and APIs (Pope, 2019). England's planning.data.gov.uk applies this method.

The application of these principles is already partially in operation through the GeoHive GZT layer on MyPlan.ie. This demonstrates the potential to deliver authoritative planning data at national level. What is proposed in this research is that this proven approach is expanded.

Where Standards Sit in the Workflow

Introducing data standards does not change what planners or GIS officers do only how they record and publish information. They still draw the same boundaries and make the same planning judgments but instead enter them into a pre-defined template rather than creating a new schema each time. This reduces duplication and saves time.

The Standards Hierarchy

In practice, standards operate at several levels:

- Format standards: what file types and projections to use e.g. GeoJSON in ITM.
- Schema standards: what fields to include for each designation type, what they are called, what data types they use.
- Vocabulary standards: controlled lists of allowed values. Instead of every council inventing its own zoning categories, a national vocabulary defines the agreed category codes. The GZT is an early example of this for zoning.
- Publication standards: where and how to publish: a persistent URL, a required update frequency, metadata following DCAT or GEMINI standards.

Addressing the Terminology

Before schema standards can be defined, the national vocabulary must be established. Currently, councils use different terms for the same concepts. Site-specific planning objectives may be called ‘Specific Development Objectives’, ‘Specific Local Objectives’, ‘Site Specific Zonings’, or ‘Key Development Areas’ depending on the authority. Regeneration areas, opportunity sites, protected views and green infrastructure all lack common terminology. This vocabulary work is not politically contentious. It does not change what councils are allowed to designate. It creates a common language for describing what they already do.

The Pipeline: From Local GIS to a National Platform

Once every authority publishes to the same standard, the national platform can automatically collect, validate and combine the data from all 31 authorities into single national layers. Each local authority publishes data at a known URL; the platform periodically harvests it; validation checks confirm required fields; problems are flagged back to the authority; passing data is merged into a national dataset available via download, API and map viewer.

A4.6 A Practical Strategy for Ireland

Why Ireland Can Move Fast

Ireland has structural advantages that England for example does not:

- 31 local authorities, not 300+. The entire GIS community can fit in one room.
- A stronger central-local relationship. The Minister has statutory powers over development plans. The OPR provides independent oversight.
- Development plans are now on a 10-year cycle with a 5-year review, providing a known schedule for plan-making.
- GeoHive and MyPlan.ie already exist as platform infrastructure.
- The OPR already reviews every development plan, providing a built-in compliance mechanism.
- The Planning and Development Act 2024 has introduced National Planning Statements with stronger enforcement powers than the previous Section 28 guidelines.

Central Team Digitises Existing Data

Waiting for 31 local authorities to individually standardise their existing development plan data is not a realistic approach for the urgency and need in Ireland. A small, skilled central team should be established to extract key spatial designations from every current adopted development plan into standardised national datasets.

The team would work systematically, council by council: obtain existing GIS data, digitise from published maps where necessary, standardise into the agreed schema, send to the council for verification and publish verified data on the national platform. The verification step preserves local ownership without burdening councils with the heavy lifting.

Priority layers should be those with the greatest impact on planning decisions: statutory land use zoning, Architectural Conservation Areas, Record of Protected Structures, flood zones, specific development objectives and TPOs/landscape designations.

Ireland can build on existing work. England's Digital Planning Programme has already published an eight-stage data-design process for over 100 planning considerations, providing a ready-made methodology that Ireland can adapt and reuse, reducing design effort significantly.

Legislative Role

In parallel, the Minister should mandate data standards for all plans adopted after a fixed date. This is the line in the sand that England has never drawn.

The Planning and Development Act 2024 has replaced Section 28 ministerial guidelines with National Planning Statements, to be approved by Government. A National Planning Statement on Planning Data Standards would define the national vocabulary, the data specifications for each designation type, publication requirements, compliance timelines and the feedback mechanism for evolving the standard over time.

The OPR as Compliance Mechanism

The OPR already reviews every development plan at each stage of the plan making process and has enforcement powers where its recommendations are not addressed, up to and including recommending the appointment of a commissioner. Data standards compliance could also sit within this review as an additional check, alongside policy consistency etc. If the data is not to standard, the plan cannot proceed to adoption, just as a plan that does not comply with the NPF or RSES cannot proceed.

The check could be largely automated. The national platform would generate a data health report for each authority, showing what is published, what is missing and what does not validate. The OPR would review this report as part of its plan assessment.

The same principle extends to regional level. Under Section 35 of the Planning and Development Act 2024, responsibility for reviewing RSES monitoring reports transfers from NOAC to the OPR, creating a single body overseeing data compliance at both local and regional levels. The Regional Assemblies also review local plans for consistency with the RSES, providing a further check that local spatial data aligns with regional designations.

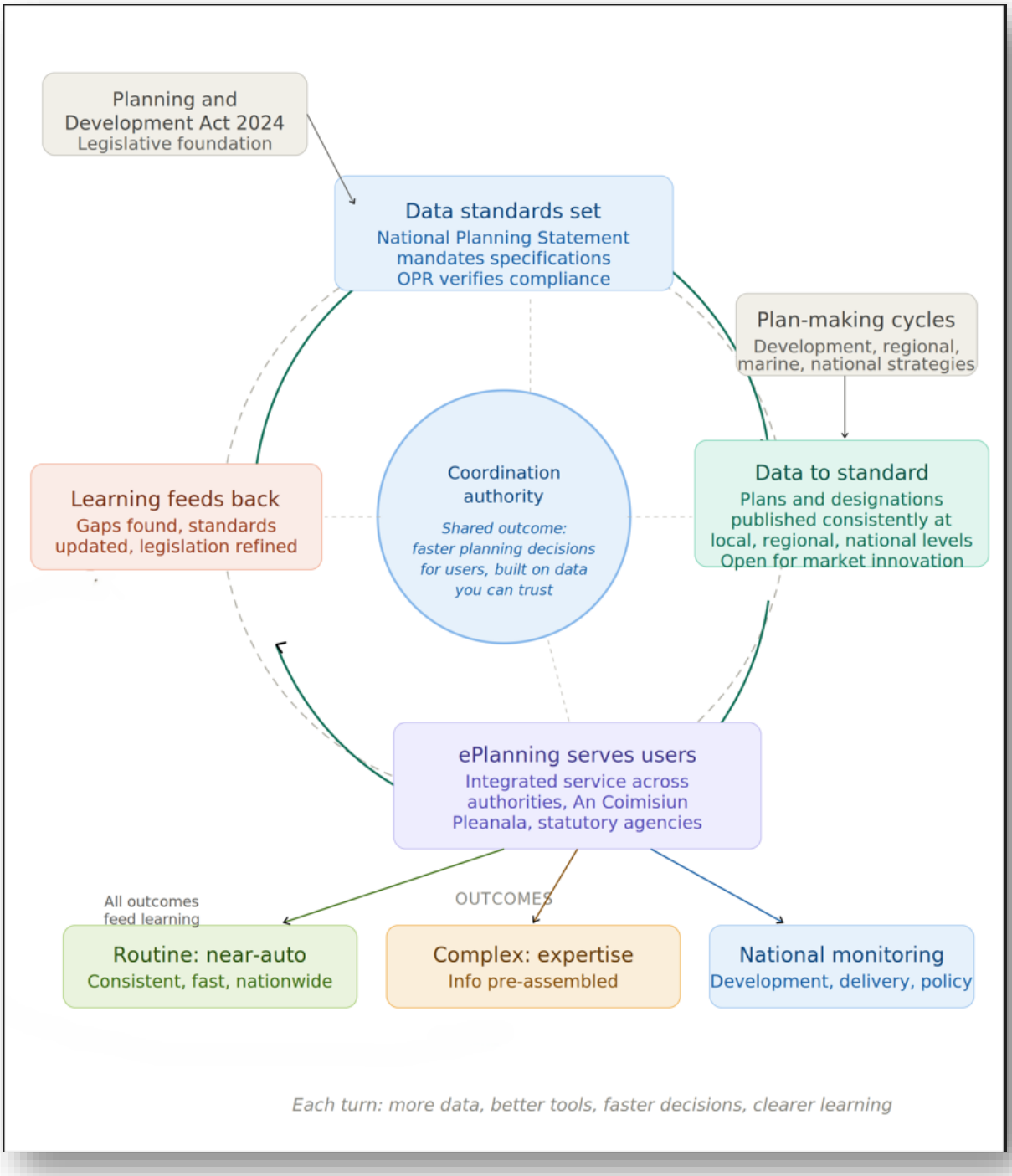
The Cyclical Governance Model

The system is designed to be self-reinforcing, as figure 10 illustrates. Each cycle of plan-making improves the data and the standard itself evolves over time:

- The National Planning Statement defines the data standards and vocabulary.
- Regional Assemblies embed the standards in their revised RSESs.
- Local authorities produce development plans to standard.
- Data is published to the national platform and automatically validated.
- The OPR verifies compliance during its plan review.
- The platform identifies gaps, inconsistencies and emerging needs.
- Feedback informs the next revision of the standard.
- The updated standard is applied in the next cycle of RSES reviews and plan variations.

This model treats the GZT as a proof of concept and extends its approach to every designation type in the development plan. What the GZT did for zoning, the National Planning Statement could do for the entire spatial content of the plan.

Figure 9: *Envisaged Cyclical Data Governance Model*



Appendix 5: Investment Comparison

A5.1 England Investment

England's Digital Planning Programme has operated since 2018 (MHCLG Digital, 2023). It is anticipated to run through to the end of the current parliamentary period in 2029/2030. In 2023 alone:

- £5.3 million was awarded to 19 councils for digital planning improvements
- £3.2 million went to 15 councils through PropTech Innovation Fund
- In total: £8.5 million (approximately €10 million).

This funding covers just two of the four intervention areas, suggesting full programme costs of approximately €20 million annually.

In addition to digital transformation, the UK Government has launched substantial capacity building initiatives (Gov.UK, 2024). The following are based on a two-year spend programme:

- £24 million Planning Skills Delivery Fund: supporting local authorities to tackle backlogs and boost capacity
- £13 million specialist deployment programme: teams of specialists deployed to local planning authorities
- £1 million to Public Practice: supporting councils to recruit and develop skilled planners
- Extended Planning Advisory Service funding: multi-year commitment to upskilling

Total Investment: approx. £36.5 million (€42.8 million) per annum for capacity and digital combined.

A5.2 Scaling to Irish Context

The UK has 337 local planning authorities. Ireland has 31 planning authorities (10% of England's total). The table below shows what this proportion would look like for Ireland when scaled on a per-authority basis:

Table 43: Estimated Irish Implementation Costs Based on England Evidence (Annual Basis)

Programme Component	England Annual Investment	England per-Authority	Irish Total (31 authorities)
Digital transformation	€20m/year	€59,347	€1.84m/year
Capacity building	€14m/year	€41,543	€1.29m/year
Specialist deployment	€7.6m/year	€22,552	€0.70m/year
Skills/recruitment	€1.2m/year	€3,561	€0.11m/year
Total Annual	**€42.8m/year**	**€127,003**	**€3.94m/year**

Multi-Year Investment Scenarios

Planning reform requires sustained investment over multiple years rather than one-off spending. The table below shows potential investment intensities across different timeframes:

Table 44: Multi-Year Investment Scenarios for Ireland

Scenario	Annual Costs	3-Year Totals	5-Year Totals	Notes
England scaled baseline	€3.94m	€11.8m	€19.7m	Direct scaling from England per-authority spending
2× baseline	€7.87m	€23.6m	€39.4m	Double England per-authority spending
3× baseline	€11.81m	€35.4m	€59.1m	Triple England per-authority spending

Higher end scenario	€20m	€60m	€100m	Upper estimate

A5.3 Relevance to Irish Context

The €50 million investment over 5 years (approximately €10 million annually) falls between the 2× baseline and 3× baseline scenarios. This reflects a moderately intensive reform programme that exceeds direct England scaling to account for Ireland's specific context whilst remaining within demonstrated international precedent.

The England figures demonstrate that comparable jurisdictions commit substantial resources to planning system reform over sustained periods. The multi-year timeframe reflects the reality that systematic change requires time to design, implement, embed and evaluate before becoming self-sustaining.

Appendix 6: Further Research Priorities

This study examined the planning application process from end to end but necessarily focused on the areas where user feedback and evidence of inefficiency were most concentrated (Section 1.4). Through that process, areas requiring further investigation were identified that would strengthen the evidence base and support implementation of the reforms set out in Chapter 6. These are grouped below by priority level. Critical priorities represent essential validation research that should precede large-scale reform implementation. High priorities address major operational bottlenecks where further evidence would enable targeted, measurable intervention.

A6.1 Critical Priorities

- **Geographic validation.** Expand the study sample to a minimum 25% of planning authorities with proportional applicant representation, to validate whether the systematic problems documented here are consistent nationwide.
- **Complete user journey research.** Extend the end-to-end user journey research to include citizens, one-off housing applicants, An Coimisiún Pleanála and clerical teams, user groups not covered in this study.
- **Specialist coordination research.** Research with internal specialists (drainage engineers, transport, conservation, archaeology) whose input is critical to decisions but whose absence at early stages generates predictable delays.

A6.2 High Priorities

- **One-off housing resource analysis.** Map the resource demands of one-off housing applications and identify frontloading opportunities to free planning officer capacity for complex developments.
- **Householder extension resource analysis.** Quantify the resource consumed by householder extension applications to establish the potential gain from triaged or guidance-based approaches.
- **Pre-application cost analysis.** Analyse pre-application costs by application type to understand resource consumption and value delivered, enabling evidence-based service redesign.
- **Validation process mapping.** Map validation processes across authorities to address frequent invalidation for minor issues and inconsistent application of requirements.
- **Clerical team workflow analysis.** Research the significant manual workload carried by clerical teams, including downloading and re-entering data between ePlanning and council systems.
- **An Coimisiún Pleanála decision making process.** Map internal decision making workflows including inspector processes, given the paper-based systems and file management vulnerabilities reported by users.
- **Appeals process analysis.** Examine the appeals process from the internal perspective, given the normalisation of appeals for significant developments and waits reported at over a year for some decisions.
- **Further Information patterns research.** Systematically quantify FI request rates across all 31 authorities, analyse patterns by application type and complexity and identify which requests could be prevented through better upfront guidance.
- **Best practice comparative analysis.** Identify and analyse high-performing authorities to understand what distinguishes them and how their approaches could be scaled nationally.
- **National standards impact assessment.** Quantify the potential savings from eliminating the administrative variation that currently requires users to navigate 31 different processes.