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Department of Housing, Local Government and Heritage, Custom House, Dublin, D01 W6X0.

22 August 2025

Re: Public Consultation for Review of Exempted Development

To whom it may concern,

We welcome the opportunity to contribute to the public consultation for the review of exempted development.

Cork Chamber represents 1,200 members together employing 130,000 people throughout the city, metropolitan area and county. Our vision is to lead a transforming and ambitious Cork City and County, uniting, representing and supporting our members and community. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals. Cork Chamber has also been designated an SDG Champion by the Department of Climate, Energy and the Environment for 2024-25.

Cork Chamber's advocacy efforts are guided by the views and priorities of our partners, and are shaped by our continuous engagement with members, our board and key stakeholders in Cork City and County. Cork Chamber is deeply committed to sustainability, embedding it within all our activities and initiatives.

Our existing planning exemptions have been in place for more than 20 years and are, in some cases, no longer fit for purpose due to modernisation, updates in development practices, and changes in market demands and requirements. To reflect the pace of change in development, it would be wise to conduct regular reviews of planning exemptions and requirements every three to five years, rather than waiting more than two decades to review the system as a whole.

Cork Chamber's members have raised issues with the planning process, and we have made submissions calling for improvements on numerous occasions, including as part of the Budget 2026 process, as well as during the reviews of the National Development Plan and National Planning Framework.

While steps have been taken to address issues identified in the planning system, including the introduction of the Planning and Development Act and the establishment of An Coimisiún Pleanála, further funding and support for authorities should be provided to improve outcomes and reduce the length of time it takes to take projects from concept and design to construction and completion.

We note that the proposed exemptions include a broad range of minor works. Streamlining these will help alleviate the workload of planners, allowing them to focus on major residential and commercial projects that can significantly contribute to resolving the housing crisis and



delivering economic benefits. Ensuring timely review and decision-making on applications will increase the number of permissions granted, which should in turn accelerate commencements and completions.

The government's stated target is to deliver 300,000 new homes by 2030 under the NDP. Current delivery trends will not meet this target without further planning reform. CSO figures show planning approval for 8,177 housing units in Q1 2025, a 2.5% decrease from Q1 2024, and approvals have not exceeded 10,000 in a single quarter since Q4 2023. While multiple factors influence these figures, delays in processing applications remain a key constraint.

Reducing the number of minor applications requiring full planning assessment would help relieve pressure on the system.

Many proposed exemptions also advance Ireland's climate objectives, including those enabling the installation of water butts, insulation, and heat pumps. As an SDG Champion, Cork Chamber supports initiatives that reduce carbon emissions and facilitate retrofitting. Cork city has also been designated an EU Mission City with the goal of reducing carbon emissions by 80% by 2030. Initiatives which encourage climate action, carbon reductions and sustainable changes are to be supported through any means necessary to help Cork, and Ireland, reach legally-binding climate targets.

We also welcome proposals to streamline infrastructure delivery through exemptions for increased EV charging capacity, clarification of planning requirements for Roads and Railways Act projects, and flexibility for Tier 1 and Tier 2 airports and ports to undertake necessary works within their existing sites. These measures will help ensure that critical transport, renewable energy, and public infrastructure projects are not stalled in lengthy planning processes.

The benefits of facilitating the quicker delivery of major infrastructure projects will be felt all over Ireland and will help to ensure that Cork can meet the ambitious growth targets established under the National Planning Framework and National Development Plan in terms of population and economic development.

Ireland's reputation and record on delivery have been poorer than many of our European neighbours in recent years, as noted by the Accelerating Infrastructure Taskforce report on stakeholder consultation.² Delays caused during the planning process are an element of this slow delivery.

Exempting certain developments, where appropriate, should reduce the time it takes for some of these projects to go from conception to delivery, while also retaining important compliance with environmental and appropriate assessments.

In addition to reforming the planning exemptions, the government must continue to invest in the training of planners to increase the number of graduates in the country. Shortages at both local authority level and with An Coimisiún Pleanála will continue to undermine legislation if they are not resolved.

¹ CSO Planning Permissions

² Accelerating Infrastructure: Report on Stakeholder Consultation and Engagement with Emerging Themes on Infrastructure

In 2022, it was noted that local authorities needed an additional 541 planners to fill gaps. While government sanctioned the hiring of 213 of those staff, just 86 have been employed.³

And while Cork Chamber favours the acceleration of the planning process to ensure more housing output, we must not lose all oversight of the sector. Appropriate standards are important in the development of properties and filling these vacant planner positions will enable this oversight to remain in place while also enabling the backlog of planning applications to be cleared.

In addition, we recommend:

- Full implementation of the Planning and Development Act, including streamlined procedures for judicial reviews.
- Introduction of a triage system to prioritise strategic infrastructure applications.
- Enhanced supports for higher and further education to increase the supply of trained planners and upskill existing staff.

Cork Chamber supports reforms that will make the planning system more efficient, transparent, and capable of meeting Ireland's housing, infrastructure, and climate targets.

We thank you for considering our submission and remain available to provide further detail or clarification.

Yours sincerely,

Conor Healy

CEO

³ Oireachtas.ie