

NPF Implementation: Housing Growth Requirements

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

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1.0 Introduction

The NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities "the Guidelines" constitute Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended) ("the Act"). These Guidelines replace the Section 28 "Housing Supply Target Methodology for Development Planning" Guidelines published in December 2020 and provide updated housing growth requirements to planning authorities in order to facilitate the revision and update of development plans in accordance with the National Planning Framework – First Revision (2025). The Guidelines interpret the national housing growth requirements identified in the Revised National Planning Framework for implementation through development plans.

1.1 Purpose of the Guidelines

Further to the approval of the Revised National Planning Framework (NPF) in April 2025, there is now a need for development plans to be updated to reflect the requirements of the NPF in respect of housing.

Section 2.7 of the Revised NPF "Translating the NPF to City and County Levels" states that "revised (housing) targets will support a plan-led approach to NPF implementation at regional and local level, allowing NPF growth objectives to be incorporated into city and county development plans as they are reviewed. In this regard, matters related to the targeted population and housing numbers and the estimated capacity of each settlement for growth is determined at the plan-making stage, in accordance with the hierarchy of plans prescribed under the Planning and Development Act".

These Guidelines set out the housing demand scenario to 2040 for each local authority by translating the NPF requirements into estimated average annual figures, drawing on the range of scenarios presented by the ESRI in the 2024 <u>updated research</u> and modelling on population growth and structural housing demand, and assumptions relating to unmet demand – refer to section 1.2 below.

The Revised NPF identifies the need to plan for approximately 50,000 additional households per annum to 2040¹. The housing demand scenario is aligned to the '50:50 cities' distribution

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¹ NPO 42 of the NPF "To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040."

in the National Planning Framework². The national target set out in the Revised NPF also includes a provision for 'unmet demand' and it is an objective of these Guidelines that this unmet demand will be addressed in the near term, up to the year 2034, subject to monitoring of the implementation of the NPF (under the EU SEA Directive and NPO 108). There will be a further review of the NPF before 2030, subject to the approval of Government.

Accordingly, these Guidelines provide the basis for a consistent approach to be taken by planning authorities in incorporating national and regionally-based population and housing projections of the Revised NPF into the statutory plans. They will assist planning authorities in appropriately integrating the strategic national and regional population parameters into the statutory planning processes, such as the preparation of the city/county development plan and the preparation of the housing strategy, informed by the Housing Need and Demand Assessment (HNDA) process outlined in NPO47 of the Revised NPF.

In this regard, the Guidelines provide the basis for ensuring that the Revised NPF takes effect within the planning system in a plan-led manner as required by the Planning and Development Act 2000 (as amended) and, for the avoidance of doubt, the Guidelines alone may not be relied on for the purposes of any consenting or permitting process and the purpose of the Guidelines is to inform a plan review or variation processes.

These Guidelines will inform the plan evaluation process undertaken by the Office of the Planning Regulator (OPR) and contribute to achieving consistency with planning policy from a national perspective, whereby agreed national and regional population projections are reliably translated into the development plan context.

These Guidelines will also assist in the provision of a basis for monitoring of the implementation of the NPF, as set out in NPO 108³ which sets an objective to develop and implement a new programme of monitoring relating to the implementation of the framework, with a particular focus on measuring outcomes relative to the key strategic objectives of the NPF.

² NPO 2 of the NPF "The projected level of population and employment growth in the Eastern and Midland Regional Assembly area will be at least matched by that of the Northern and Western and Southern Regional Assembly areas combined".

³ NPO 108 "Develop and implement a new programme of monitoring of the implementation of the National Planning Framework, with a focus on measuring outcomes relative to the key strategic objectives of the NPF including more balanced regional development, city-based growth, compact growth and infrastructure delivery"

1.2 ESRI Population/Structural Housing Demand Projections and Unmet Demand

The ESRI⁴ paper published in 2024 as part of the revision process projected, in the baseline population scenario, an estimated increase of 922,000 in Ireland's population between 2022 and 2040, resulting in a total estimated projected population of over 6.106 million people by the end of the period.

Based on three demographic scenarios (baseline, high international migration and low international migration), as well as a range of assumptions on headship rates (based on current trends and a fall in household size) and obsolescence rates (0.25 per cent and 0.5 per cent), 12 main structural housing demand scenarios were considered. Taking the average over all 12 scenarios, structural housing demand was projected to be around **44,000 per annum (p.a.)** from 2023–2030, and around **39,700 p.a.** over the 2030–2040 period, giving an overall average from 2025 to 2040 of **c.41,000** per annum.

Comparing estimated demand as per the ESRI's projections to actual delivery (new build plus previously unfinished housing estates built out, as per the Central Statistics Office (CSO) suggests unmet demand of approximately **140,000** arising over the period 2017 to 2024. The methodology for deriving this figure involved applying alternative headship rates to the population to estimate the number of households based on these headship rates. Assuming a start year of 2025, and the objective of meeting unmet demand in the period to 2034, this translates to an annual average of **13,900** dwellings per annum over the period.

This means an estimated total housing demand of c.55,000 dwellings per annum to 2034 and an estimated total housing demand of c.41,000 dwellings per annum between 2034 and 2040.

2.0 Implementation of the Housing Growth Requirements

2.1 Introduction

Planning authorities are required under Section 10(1A) of the Planning and Development Act 2000 (as amended) to prepare a 'core strategy' and to ensure that the development plan is consistent with the national and regional development objectives specified in the National Planning Framework and the relevant regional spatial and economic strategy. Section 4 of the "Development Plans - Guidelines for Planning Authorities" (2022) sets out the methodology

⁴ Population Projections, The Flow of New Households and Structural Housing Demand, Bergin and Egan (2024)

for devising and incorporating the 'core strategy' which is "intended to give spatial expression to the housing, population, land and employment parameters of the development plan".

Planning authorities should therefore assess the current adopted City and County development plans against the requirement to provide the capacity to develop housing to the extent identified in these Guidelines. This assessment should involve the review of the relevant core strategy and settlement strategy, with the associated identification of development potential and zoning objectives updated where necessary to reflect the housing growth requirements set out in Appendix 1, and the application of 'additional provision' as set out below, subject to the relevant environmental assessments being undertaken as required by the Act and in accordance with the Revised NPF.⁵

2.2 NPF Housing Growth Requirements

Policy and Objective 1:

It is a policy and objective of these Guidelines that the housing growth requirements for each planning authority set out in Appendix 1 are reflected in the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.

Given the urgency of the housing crisis, planning authorities should commence the process of revising and varying the development plan against the policies and objectives of these Guidelines as quickly as possible – refer to section 3.0 below.

The housing growth requirement figures (set out at Appendix 1) for each local authority are provided in the form of an annualised estimated housing figure for two time periods (2025 to 2034 and 2034 to 2040). The figures represent the long-term growth requirements to 2040 but are presented in an annualised form in the interests of clarity and having regard to the fact that development plans across the 31 planning authorities are at different stages of the 6-year cycle of each Plan.

⁵ NPO 1 of the NPF "Ensure that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA, SFRA and AA, as appropriate."

The housing distribution at local authority level is based on the NPF 50:50 City preferred scenario, which in turn is built on the NPF objective to achieve more regionally balanced population growth, split roughly 50:50 between the Eastern and Midland Region, and the rest of the Country (i.e. the Southern Region and Northern and Western Region). The regional population projections are set out in NPO 3 of the Revised NPF.⁶

The housing growth requirement incorporates a calculation for unmet demand and unmet need. The objective of addressing unmet demand in the short-medium term means that the housing growth requirement will be larger for each local authority in the initial 10-year period to 2034. The environmental carrying capacity of settlements is a critical consideration in assessing the application of larger growth requirements and will require environmental assessments through the development plan review or variation process. It should also be noted that, in accordance with NPO 7 of the Revised NPF, at least 40% of new development must be within the built-up footprint of existing settlements to ensure compact and sequential patterns of growth.

2.3 Housing Growth Requirement Additionality

Policy and Objective 2:

It is a policy and objective of these Guidelines that 'additional provision' of up to 50% over and above the housing growth requirement for each local authority set out in Appendix 1 is reflected within the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.

Most current adopted development plan core strategies already incorporate a level of provision over and above the baseline 'housing supply targets'. The Ministerial Guidelines "Housing Supply Target Methodology for Development Planning" (2020) provided for an additional 25% headroom for housing targets in local authorities, in certain circumstances, to allow for 'convergence' with targeted housing output over time. The "Development Plans - Guidelines for Planning Authorities" (2022) provided the potential for a further 20-25% 'additional provision' in zoned lands⁷; an approach which recognises that a degree of choice in

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⁶ NPO 3 of the NPF "Eastern and Midland Region: 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million; Northern and Western Region: 150,000 additional people between 2022 and 2040 (c. 210,000 additional people over 2016-2040) i.e. a population of just over 1 million; Southern Region: 330,000 additional people over 2022 levels (c. 450,000 additional people over 2016-2040) i.e. a population of just over 2 million"

⁷ Section 4.4.3 'Ensuring Sufficient Provision of Housing Lands/Sites'

development sites to be provided locally is desirable, to avoid restricting the supply of new housing development through inactivity on a particular landholding or site.

For the purposes of these Guidelines, planning authorities should address the scope for additional provision of up to 50% in excess of the baseline housing growth requirement set out in Appendix 1, in light of the urgent need to increase housing delivery and to optimise the ability to deliver on the housing requirements of the Revised NPF. 'Additional provision' recognises the fact that, for a variety of reasons, a relatively significant proportion of zoned lands are not activated over the period of a development plan.

This process will involve consideration of the potential need to identify additional lands suitable for residential zoning, in addition to the need to develop infill housing, housing on brownfield lands and to address vacancy and dereliction. In this regard, it will be necessary to consider the requirements of NPO 7⁸ of the Revised NPF to deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements to ensure compact and sequential patterns of growth, and the further requirement to be consistent with NPO 11⁹ and NPO 66¹⁰ of the Revised NPF.

Notwithstanding that the recommended quantum of 'additional provision' over and above the baseline housing growth requirements set out in these Guidelines is up to 50%, the justification for this additionality and the criteria for the selection of land and sites should be carried out in accordance with the existing provisions of the "Development Plans - Guidelines for Planning Authorities" (2022), as set out in Section 4.4.3 thereof - "Ensuring Sufficient Provision of Housing Lands/Sites".

2.4 Tiering and Phasing of Land

It is the policy of the NPF that planning authorities are required to apply a standardised, tiered approach to zoning to differentiate between (i) zoned land that is serviced and (ii) zoned land that is serviceable within the life of the plan (NPO 101¹¹).

⁸ NPO 7 of the NPF "Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth."

⁹ NPO 11 of the NPF "Planned growth at a settlement level shall be determined at development plan-making stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment."

¹⁰ NPO 66 of the NPF "The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the medium and longer-term requirements of all relevant environmental and climate legislation and the sustainable management of our natural capital."

¹¹ NPO 101 of the NPF "Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan."

Planning authorities in all instances should prepare a 'Settlement Capacity Audit' as part of a review or variation process in line with the provisions of the "Development Plans - Guidelines for Planning Authorities" (2022), in order to both identify zoned serviced/serviceable lands, and to highlight infrastructural requirements.

The application of these Guidelines, including both the updated housing growth requirements and the need for additionally over and above, and the future legislative requirement under the Act of 2024 to plan for longer term, 10-year development plan periods, will require planning authorities to consider how to address zoning and phasing over this longer arc of development.

Whether varying the current adopted development plan, reviewing the development plan under the Act of 2000 or preparing a 10-year development plan under the Act of 2024, planning authorities should consider as an immediate priority the suitability of lands for development over a 12 year plus period (to encompass the remaining period of the current adopted plan and the lifespan of the new 10-year development plan).

In this regard, the planning authority should undertake a Settlement Capacity Audit to identify zoned serviced/serviceable lands with residential development potential in all relevant settlements, specifying enabling infrastructure, for example wastewater network or treatment infrastructure, energy infrastructure, roads or public transport capacity and in the case of enabling social infrastructure, schools provision and community facilities.

The undertaking of this preparatory work as an immediate priority will ensure that the significant task of integrating longer-term housing requirements in larger scale development plans can be carried out as expeditiously as possible, upon commencement of the relevant provisions of the new Act.

Long-Term Strategic and Sustainable Development Sites/Opportunity Areas

The "Development Plans - Guidelines for Planning Authorities" (2022) set out that lands that are 'not likely' to be developed within the plan period may be identified for the purposes of residential development as 'Long-Term Strategic and Sustainable Development Sites'; reflecting the fact that they will deliver housing within the subsequent development plan period.

Lands which offer the potential to meet the objectives of these Guidelines but are not serviced or serviceable during the lifetime of the current adopted development plan, may be identified as 'Long-Term Strategic and Sustainable Development Sites/Opportunity Areas' in order to give clear strategic direction to future development locations, in consultation with infrastructure providers. The residential development capacity associated with the parts of these sites/areas that are not likely to come forward for development within the period of the current adopted

plan may be considered as further 'additional provision' over and above the baseline housing growth requirements and the up to 50% 'additional provision' referenced above.

The identification of Long-Term Strategic and Sustainable Development Sites/Opportunity Areas should be focused on the five cities and Metropolitan Area Strategic Plan areas, designated Regional Growth Centres, and designated Key Growth Centres.

This approach aligns with the lead-in time required to service long-term strategic opportunity sites/areas, requiring engagement with utility providers and also with the provisions within the Revised NPF relating to Transport Orientated Development (TOD) opportunities and the legislative provisions relating to Candidate Urban Development Zones and Urban Development Zones included within the Act of 2024.

Specific phasing policies should be set out for 'Long-Term Strategic and Sustainable Development Sites/Opportunity Areas' to ensure that identified and required new infrastructure is delivered in tandem with new residential development and also to ensure the environmental carrying capacity of settlements is fully addressed when proposing land use zoning.

3.0 Variation and Review of Development Plans to Implement the Objectives of the Guidelines

3.1 Development Plan Variations

Planning Authorities should initially assess the current adopted development plan and review the core strategy and associated settlement strategy and zoning objectives against the objectives of these Guidelines.

In all cases, a review of the adequacy of existing zoned lands to cater for the Housing Growth Requirement figures (Appendix 1) **and** the potential for 'additional provision' as set out above for the full duration of the current adopted development plan should be assessed, with a particular focus on the likelihood that the lands identified for residential development within the plan will come forward for development within the remaining period of the plan. This assessment should take into account factors including the planning history of zoned lands and activation of sites, and the availability of or potential for servicing. Where the planning authority considers that lands may not come forward for development within the remaining period of the existing plan, it may be necessary to consider the zoning of alternative lands where there is capacity to deliver housing in the short to medium term.

Having reviewed the current adopted development plan against having regard to these Guidelines, the Chief Executive of each planning authority should prepare a report for the Elected Members, setting out the development capacity of existing zoned lands, including detailed information on the serviced status and planning status of lands, and demonstrating the means by which it is proposed, in the form of a recommendation from the Chief Executive, to secure the objectives of these Guidelines. A copy of this report should be provided to the Minister for Housing, Local Government and Heritage and the Office of the Planning Regulator¹².

Any variation to a development plan will require to be assessed under relevant EU Directives including the Strategic Environmental Assessment, Floods and Birds and Habitats Directives.

3.2 Ten Year Development Plans

The Planning and Development Act 2024 ('the Act of 2024' was signed into law on 17 October 2024 and an <u>implementation plan</u> was published by Government¹³ in March 2025, setting out the details of a phased commencement of the Act to facilitate the transition from the existing legislative framework to the new legislation across the planning system. It should be noted that the existing provisions in the Act of 2000 will remain in place until the relevant provisions in the Act of 2024 are commenced and the corresponding provisions of the Act of 2000 are repealed.

Following commencement of Part 3 of the Act of 2024, planning authorities will be required to prepare development plans that have a 10-year lifespan. The 'Housing Development Strategy' cited in Section 46 of the Act of 2024 provides for the incorporation of housing growth targets and ensuring that sufficient and suitable land is zoned.

The Act of 2024 sets out a new approach to development plan making, based around a suite of strategies. Further Guidance will issue in due course to local authorities to update the current Section 28 Guidelines "Development Plans - Guidelines for Planning Authorities" (2022) and will provide specific guidance on the integration of longer-range housing requirements into core strategies.

The Act of 2024 includes provisions relating to the issuing of National Planning Statements and provisions which permit the Minister for Housing, Local Government and Heritage to

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¹² via ForwardPlanning@housing.gov.ie and plans@opr.ie

¹³https://www.gov.ie/en/department-of-housing-local-government-and-heritage/publications/implementation-planfor-the-planning-and-development-act-2024/

require planning authorities to review and, if necessary, vary the development plan further to the issuing of a National Planning Statement, following review by the Office of the Planning Regulator, in order to ensure that the development plan is materially consistent with the National Planning Statement¹⁴.

The preparation or variation of a development plan under the Act of 2024 will require to be assessed under relevant EU Directives including the Strategic Environmental Assessment, Floods and Birds and Habitats Directives.

3.3 Review of Development Plans under the Act of 2000

Planning authorities commencing the development plan review process under the Act of 2000 should ensure that the current adopted development plan is also varied, as set out in section 3.1 above, noting the need to ensure that the requirements of the Revised NPF are reflected in development plans as quickly as possible.

Section 68 of the Act of 2024, includes transitionary arrangements which allow, in certain circumstances and where necessary, existing development plans to continue in force as the planning system transitions to operate under the new structures provided for in the Act of 2024.

3.4 Local Area Plans

Planning authorities should ensure that the objectives of these Guidelines are not reflected in Local Area Plans without also being reflected within the relevant development plan, given the need to ensure that the core strategy and settlement strategy of each development plan provides the overarching and comprehensive approach to housing requirements for the administrative area of the local authority, in accordance with the "Development Plans - Guidelines for Planning Authorities" (2022).

Policy and Objective 3:

It is a policy and objective of these Guidelines that planning authorities should use all available means to ensure that the objectives of these Guidelines are incorporated within development plans as quickly as possible through the variation of the current adopted development plan. Where a planning authority is undertaking a development plan review under the Act of 2000 or preparing a new development plan under the Act

¹⁴ Section 61 of the Planning and Development Act 2024

of 2024, a parallel process of varying the current adopted development plan, as appropriate, should be undertaken. The policies and objectives of these Guidelines should not be reflected in Local Area Plans without also being reflected within the relevant development plan.

4.0 Monitoring

It will be necessary to undertake ongoing monitoring of development plan core strategies to measure the delivery of housing against the targets set and also to align with SEA monitoring of both the individual development plans as required under the SEA Directive, and also the cumulative impacts assessed as part of the NPF SEA monitoring. Accordingly, planning authorities should ensure that details of monitoring are published regularly.

Appendix 1

			2025 to 2034	2035 to 2040
	Existing Annual 2020 Housing Requirement	Adopted Development Plan - Annual Housing	New Annual New Housing Growth	New Annual New Housing Growth
	(Housing Supply	Requirement (Housing	Requirement to	Requirement 2035
Local Authority	Target)	Supply Target)	2034	to 2040
Carlow County Council	406	518	518	507
Cavan County Council	479	666	666	599
Clare County Council	550	960	985	687
Cork City Council	2,032	2,706	2,706	2,539
Cork County Council	2,437	3,769	3,837	3,045
Donegal County Council	965	1,280	1,283	1,206
Dublin City Council	4,861	8,196	8,196	6,075
Dun Laoghaire Rathdown	1,908	3,085	3,585	2,384
Fingal County Council	1,717	2,738	3,153	2,146
Galway City Council	754	739	790	942
Galway County Council	1,831	1,790	2,008	2,288
Kerry County Council	690	1,167	1,167	862
Kildare County Council	1,535	1,524	2,755	1,918
Kilkenny County Council	618	775	948	772
Laois County Council	468	666	1,244	585
Leitrim County Council	124	201	201	155
Limerick City & County Council	2,193	2,599	2,599	2,740
Longford County Council	333	428	428	416
Louth County Council	956	1,380	1,677	1,195
Mayo County Council	501	542	1,111	626
Meath County Council	1,090	2,826	2,942	1,362
Monaghan County Council	306	330	751	382
Offaly County Council	439	663	891	549
Roscommon County Council	285	392	392	356
Sligo County Council	468	672	672	585
South Dublin County Council	1,932	2,596	3,270	2,414
Tipperary County Council	605	1,008	1,008	756
Waterford City & County Counci	705	804	1,144	881
Westmeath County Council	548	983	983	685
Wexford County Council	578	1,072	1,622	722
Wicklow County Council	745	1,411	2,068	931
Total	33,059	48,484	55,598	41,312

Note: The figures included above relating to the adopted development plans have been compiled based on the current adopted development plans for each planning authority.

