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13 May 2026 EPAC Reference No-EPAC-0926

Re: Consultation on the OPR Strategy Statement 2026-2031

Dear Niall,

The EPA welcomes the opportunity to comment on the Strategy Statement for the Office of the Planning Regulator (OPR). The EPA has had many positive engagements with the OPR and look forward to ongoing collaboration with the OPR, in particular in relation to our Research and Strategic Environmental Assessment roles.

As you are aware, the National Planning Framework First Revision requires significant housing development and investment in service infrastructure. Given the importance of a clean, well-protected environment for our health, our wellbeing and our economy, it is vital that future planning and development is carried out in an environmentally sustainable manner. In this context, the EPA welcomes the OPR's *"vision that Ireland to develops sustainably, supported by a planning system that enables the delivery of much needed homes and infrastructure, while protecting our environment and heritage, as well as enhancing our communities."*

The EPA wishes to make four points for you to consider in the finalisation of your Strategy Statement relating to:

- Planning enforcement;
- Scope of strategic objectives relating to the environment;
- Infrastructure delivery;
- Strengthening SEA practice in Ireland.

Planning Enforcement

Large scale extraction of peat is a particular concern for the EPA. The EPA has deployed significant resources to control the unregulated large scale peat sector with legal actions in the District and High Courts having successfully halted illegal peat extraction on several sites. The EPA report on Large Scale Illegal Peat Extraction[1] highlighted that:

- Illegal large-scale extraction of peat is widespread in Ireland and that the sector does not operate within planning or environmental laws.
- The EPA was investigating 38 large scale operations over seven counties where illegal peat extraction is taking place.
- Seven Local Authorities must take appropriate enforcement action against operators of illegal large scale peat extraction.

The EPA notes that the OPR includes in its 'Purpose' to independently oversee and drive improvements in the planning system including reviews of the performance of local authority planning systems and procedures. In this context, the EPA strongly recommends that an additional strategic objective on planning enforcement is considered for inclusion under Strategic Goal 2 so that the necessary work on planning enforcement, including large scale extraction of peat, is supported and delivered consistently by Local Authorities.

Scope of Environmental Objectives

The EPA notes your strategic objective under Strategic Goal 4 "*Play our part in delivering on climate objectives in line with the Climate Action Plan"*. The EPA suggests that you should consider wider environmental objectives in this context including air quality, noise management and water quality, as good planning has a significant impact on the achievement of national and EU targets in these environmental domains and can have substantial benefits for health. Consideration could be given to whether such a strategic objective would be more appropriately included under Strategic Goal 1 Oversee and ensure the implementation of Government planning policy.

Infrastructure Delivery

We refer you to Ireland's State of the Environment Report 2024 (SOER 2024) that highlighted the need for scaling up investment in water, energy, transport and waste management infrastructure. The EPA notes the significant work being undertaken nationally in this regard via the Accelerating Infrastructure Task Force. The EPA suggests that reference could be made within the Strategy Statement to OPR's support for the proper planning and delivery for this infrastructure that better enables the sustainable development of Ireland.

The EPA wishes to highlight two areas of this infrastructural need that may merit some consideration in the finalisation of the strategy statement.

The EPA continues to promote focussed investment in wastewater and drinking water infrastructure to address current areas of concern. Specifically, the EPA is focussed on improving the resilience of drinking water infrastructure and has published lists of areas where action is needed to provide safe and secure supplies. In relation to wastewater infrastructure the EPA publishes lists of agglomerations where there are deficiencies in current infrastructure including those that are in non-compliance with the Urban Waste Water Treatment Directive.

[1] Large Scale Illegal Peat Extraction Report 2025 | Environmental Protection Agency

The EPA suggest that through the development of regional and local development plans current deficiencies in water infrastructure, especially where there are ongoing compliance issues with national and EU law, should be identified as priorities.

With respect to the circular economy, nine million tonnes of construction and demolition waste was generated in Ireland in 2023, the largest category of waste generated. In its submission on the National Planning Framework, the EPA welcomed the opportunities to re-use and regenerate vacant, derelict and under-occupied buildings through implementing the Town Centre First Policy and using the Urban and Rural Regeneration and Development Funds. These policies will help align circular economy ambitions to reduce the use of resources and maintain the value of materials in the economy for as long as possible. The policies should have a positive impact on construction and demolition waste generation volumes. The EPA suggests that the inclusion of a strategic objective under Strategic Goal 1 to promote the circular economy would support the OPR's vision "that Ireland develops sustainably".

Strategic Environmental Assessment (SEA)

The EPA has noted that further improvement is needed in Strategic Environmental Assessment (SEA) practice, especially scoping of assessments and on the monitoring of significant effects. The EPA suggests that consideration should be given to how the work of OPR could support better performance in SEA practice by Local Authorities through delivery of training and practical support initiatives to instil best practice and a culture of continuous improvement under Strategic Goal 2 "Drive and support performance in the planning system".

If you require any additional information in relation to points raised in this submission, the EPA would be happy to meet the relevant team to discuss further.

Yours sincerely,

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Dr. Eimear Cotter

Director General