

First Revision to the National
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RE: First Revision to the National Planning Framework Consultation CCAC Response

The Council welcomes the recent publication of a consultation on the revision to the National Planning Framework (NPF) on 10th July and engagement in 2024 through the Planning Advisory Forum.

The Council considers the NPF, including regional targets for renewable electricity generation deployment, to be a pivotal policy document and urges the Government and the Department of Housing, Local Government and Heritage to recognise this urgency and ensure that the revised National Planning Framework is completed in 2024. There is no time for delay if we are to meet our legal obligations nationally and internationally to reduce emissions at the pace required.

Considering the vital, systemic role planning will be required to play in supporting the delivery of Ireland's Climate Action agenda, the Council has developed a number of recommendations relevant to this revision in relation to compact growth, the built environment, transport, electricity, climate resilience and biodiversity which are set out below.

Compact Growth

1. The Council recommends a significant increase in compact growth targets in line with the recommendations of the 2023 Expert Group Review¹; the OECD² and Councils³ earlier recommendations.
2. While housing targets in many County Development Plans align with the objectives of the NPF, disappointingly this does not appear to translate into implementation in local planning decisions in practice⁴. Real time monitoring along with timely delivery to meet structural (demographic) housing demand is imperative particularly as the spatial distribution of new developments will lock-in transport, heating and built environment emissions for decades to come.

¹DHLGH Report of Expert Group for the First Revision of the National Planning Framework: [gov - Report of Expert Group for the First Revision of the National Planning Framework \(www.gov.ie\)](http://www.gov.ie)

² OECD Redesigning Ireland's Transport for Net Zero: https://www.oecd.org/en/publications/redesigning-ireland-s-transport-for-net-zero_b798a4c1-en.html

³ CCAC Annual Review 2024 – Built Environment: <https://www.climatecouncil.ie/councilpublications/annualreviewandreport/AR2024-Built%20Environment.pdf>

⁴ Data on these trends is available in an online tool which presents all of the local authority core strategy housing targets for each settlement set against the actual construction trends. See: [Housing Delivery Tracker](#)

3. The publication of an updated 'Implementation Roadmap' to translate national and regional planned growth projections to city and county levels is both critical and urgent and should be completed in 2024.
4. To further develop infill and brownfield lands, the Council supports the priority focus of the Land Development Agency in cities and regional centres and urges Government to introduce measures to reduce the comparative costs of brownfield or infill development.
5. The updated Rural Housing Guidelines, which are currently in development, should be consistent with strengthening the viability of rural towns and smaller settlements and need to be completed as soon as possible.

Built Environment

1. The Council recommends that additional measures are considered by the Government to encourage and boost the renovation of derelict and vacant properties through further land activation and taxation measures while addressing existing barriers to refurbishment and incentives for urban brownfield/infill development to address viability issues.
2. The Council supports the growth and development of efficient district heating, electrification of heating and utilisation of geothermal energy. In its recent Sectoral Review of the Built Environment, the Council recommended a '*comprehensive approach to decarbonising the heat sector, building on interactions between district heating, heat pumps and the phasing out of all new fossil fuel heating systems.*' In relation to the revision to the NPF, the Council recommends:
 - a. National Strategic Objective 8 should be further strengthened from stating '*district heating networks will be developed, where technically feasible and cost effective...*' to ensure that the critical role of district heating deployment in tandem with the roll-out of other low-carbon heat sources is clear.
 - b. To further support the development of district heating, targets for compact growth, urban regeneration and support for urban/infill development should be increased as these measures would boost both the intensity of heat demand and the availability of heat sources.

Sustainable Transport

The Council welcomes the strengthened commentary on sustainable mobility and the need to integrate land-use and transport as the costs of provision and accessibility of public transport and active travel infrastructure are directly linked to the spatial distribution and density of settlement patterns.

1. The role of Transport Oriented Development (TOD) in delivering compact growth is evident. However, the main document lacks a clear definition of TOD and the absence of institutional and funding arrangements to deliver TOD at suitable locations limits the effectiveness of this approach.
2. The Council welcomes that the Metropolitan Area Strategic Plans are to include provision for large-scale TOD opportunities and targets planned growth along current and future high-capacity public transport corridors. However, outside the Greater Dublin Area, the metropolitan area transport strategies are currently non-statutory plans developed by the NTA in cooperation with the relevant Local Authorities and other agencies. It is therefore urgent that legislation is amended to extend the remit of the NTA to the remaining cities in Ireland.

3. Ensuring the integration of safe and convenient alternatives to the car into the design of Ireland's communities by prioritising walking and cycling accessibility is welcome and requires specific indicators to measure achievement, for example by utilising the range of accessibility tools currently in development by the NTA.

Renewable Electricity

1. Reducing and rapidly eliminating the importation of fossil fuels is imperative; to protect citizens from the volatility in fossil fuel prices, to ensure energy security and reduce greenhouse gas emissions. The Council recommends urgent action through a strengthened National Planning Framework including the Renewable Electricity Spatial Planning Framework; the rapid implementation of the recast Renewable Energy Directive and the mapping of Renewable Acceleration Areas, to support the investment in and delivery of onshore wind and solar renewable electricity.
2. The Council urges full alignment between regional and local plans and renewable energy targets at national and regional levels. The timely finalisation of a Regional Renewable Electricity Strategy (RRES) by each Regional Assembly will be critical to allow Local Authorities to consistently plan for the delivery of Target Power Capacity (MW) allocations through their City and County Development Plans.
3. The Council proposes that further details on the methodology for regional capacity allocations and the interaction of Target Power Capacity (MW) allocations with the development of the electricity network and supporting infrastructure should be set out in the final version of the NPF.
4. The Council has previously called for the publication of updated Wind Energy Guidelines as soon as possible to support the implementation of these regional targets.
5. The Council supports measures to ensure that Ireland's port infrastructure facilitates the development, maintenance and operation of offshore renewable electricity generation, along with the development of enabling onshore infrastructure. Moreover, increasing the ability of Ireland's ports to withstand climate change impacts will be vital in ensuring their resilience and thus maintaining their core functions.

Climate Resilience

1. The Council has consistently emphasised the need for a Coastal Management Plan that enhances the resilience of Ireland's coastal areas and communities to climate change impacts, including sea level rise and increased coastal erosion. Significant funding will be required to address these twin challenges. The Council welcomes the development of coastal management plans as well as coastal environment planning for climate change.
2. While the Council supports National Policy Objectives 51, 52 and 56 relating to ports and offshore renewable energy, there is an urgent need for ports to adapt to the impacts of climate change and take measures to strengthen their resilience to sea level rise and more frequent and severe weather events. A comprehensive approach is needed from ports to the integration of climate risks in their operations, planning, infrastructure investments and decision-making.
3. The Council recommends strengthened measures to ensure that all future infrastructure developments are climate-proofed through the new infrastructure guidelines and appropriate appraisal frameworks. Equally, existing vulnerable critical infrastructure needs to be made more climate resilient.

4. The application of nature-based solutions to reduce flood risk, manage stormwater, rainwater and surface water risk and in retrofitting existing environments to cater for surface water run-off is welcome. The Council recommends prioritising nature-based approaches in additional areas such as agriculture, forest management, integrated constructed wetlands and coastal and marine protection measures.

Biodiversity

1. The Council supports the approach relating to biodiversity, specifically the new National Policy Objectives 83-85 introduced in the revision in relation to implementation of the National Biodiversity Action Plan and European Union Nature Restoration Law.
2. However, the Council points out that significant funding is needed to prioritise the protection and restoration of carbon stocks within terrestrial, coastal and marine habitats under special protection and to enhance the condition of biodiversity in agricultural and forest ecosystems.

The Council looks forward to providing any further assistance or advice as required and to the conclusion of this process by the end of 2024.

Regards,



Chairperson

Climate Change Advisory Council