

National Adaptation Framework Public Consultation  
Aarhus, Climate Adaptation, Citizen Engagement and Local Government Division  
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[By email to: [NationalAdaptationFramework@decc.gov.ie](mailto:NationalAdaptationFramework@decc.gov.ie)]

9 February 2024

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**Re: National Adaptation Framework Public Consultation**

1. The Irish Planning Institute (IPI) welcomes the opportunity to provide our views on the role of planning in creating a climate resilient Ireland, particularly in light of the discussion on the role of national planning policy and processes in the consultation document. As noted in the recently published Ireland's Climate Change Assessment, planning is critical to adaptation in urban and rural settlements.
2. Founded in 1975, the Irish Planning Institute is the all-island professional body representing professional planners engaged in physical, spatial and environmental planning in Ireland and Irish planners practicing overseas. Representing over 1,000 planners across the public and private sector, members of the Irish Planning Institute work in Local Authorities, An Bord Pleanála, Central Government, Regional Assemblies, Academia, in Private Practice as Consultants, for large developers and for semi state organisations.
3. The planning process provides an established means through which to implement and integrate climate change mitigation and adaptation objectives and our members have extensive experience in relevant climate action implementation matters at policy, strategy and project level. However, the ambition of the National Climate Objective has not yet been fully mapped into planning policy and practice and the hierarchy of planning can be better aligned to meet mitigation and adaptation goals.

**Sustainable Development**

4. Sustainable development, the achievement of the 2030 Sustainable Development Goals and the role of the planning system in achieving them should be explicit throughout the next National Adaptation Framework. Sustainable Development provides and will continue to provide both the underpinning philosophy and the guiding objectives for planning. It is within this that climate mitigation and adaptation and any trade-offs and synergies can be absorbed.
5. The IPI strongly supports measures to encourage place-based and project-based learning on sustainability issues in the community. The plan making process for local area plans, public realm improvement plans and masterplans for parts of cities, towns and villages, all provide excellent vehicles for community engagement and education for climate action and sustainable development. There is a role for Planners who are adept at bringing together communities of place and interest to discuss and invent new ways of developing our built environment more sustainably. Funding practical projects as part of these would further

engage communities. Planners are well placed to facilitate these processes, but, there is a requirement for increasing staff numbers in local authority planning departments to allow this to occur.

## **Resourcing**

6. Local authorities have experienced long-term funding constraints and staffing restrictions, while at the same time fulfilling existing and new functions, a situation which the imperative of climate action has compounded. Ultimately, ensuring the planning system plays its role in climate action as sustainably, efficiently, transparently and coherently as possible cannot realistically be achieved unless substantial further resources, not least additional planners, planning administrators and other specialists (such as ecologists, GIS specialists, and marine scientists etc.) are recruited both in local authorities and An Bord Pleanála and are available to the wider terrestrial and marine planning system. The next NAF must understand the resources and finances required to facilitate this transition, throughout all elements of the spatial planning and development cycle.

## **National Planning Framework (NPF)**

7. The discussion of how adaptation planning integrates with the National Planning Framework must be significantly more explicit in the next NAF.
8. Compact growth as promoted in the NPF must recognise climate impacts, particularly those associated with increased impermeable surfaces (and surface flooding risks), building orientation in relation to indoor solar gain and ventilation to reduce wind impact risks, and the use of Green Infrastructure to address flood risks and overheating. This includes the potential of urban land to provide key ecosystem services, such as urban cooling or flood alleviation, as part of effective land use management.<sup>1</sup>
9. In addition to revising the text of the current climate NSO in the National Planning Framework and associated NPOs to reflect our increased obligations to achieve a climate resilient, biodiversity rich and climate neutral economy by no later than the end of the year 2050, the revised NPF should place further emphasis on adaptation to the impacts of climate change and the need to reduce the vulnerability of current and future buildings and infrastructure and the revised NAF should align with this.

## **Policy Alignment**

10. The alignment of public policy is a key issue. The planning policy hierarchy requires different levels of the planning process to address climate change, however the implications of the Local Authority Climate Action Plans on recently adopted City and County Development Plans remains unclear. How adaptation and resilience is considered in the forthcoming Renewable Electricity Strategy, Regional Renewable Electricity Strategies, Local Authority Renewable Energy Strategies and accompanying methodology is unclear and these will create a complex framework which will be challenging to integrate into existing plans and policies, particularly given current resource constraints. The implications of new and revised planning instruments for adaptation following reform of the planning system must also be understood.

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<sup>1</sup> Scott, M., Burns, L., Lennon, M. and Kinnane, O. (2022) Built Environment Climate Resilience and Adaptation. Available at: [https://www.epa.ie/publications/research/climate-change/Research\\_Report\\_418.pdf](https://www.epa.ie/publications/research/climate-change/Research_Report_418.pdf)

11. When being developed the planning aspects of the next NAF should be mapped onto existing policy and legislative requirements, including case law as appropriate, with any inconsistency or competing objectives identified and addressed. The interaction of development plan and development management guidance and policy with adaptation in areas as diverse as daylight performance, finishes and materials, and drainage must be properly understood.
12. Further feedback from stakeholders and analysis of the progress of action 11 of the NAF (*Ensure climate proofing considerations are fully integrated into arrangements and reforms arising from the new Ireland 2040 - National Planning Framework including Guidelines, updated guidance on adaptation proofing of SEA and EIA and also in revisions of building standards*) should be published to inform how planning is to be considered in the next iteration of the NAF. Environmental assessments are a key component of planning policy and decision making. Given the recognised weaknesses in SEA monitoring in Ireland, a final SEA monitoring report should be required at the end of the development plan cycle to inform the draft development plan, support plan-led and evidence-based planning and increase transparency.

### **Research and Innovation**

13. As noted in Ireland's Climate Change Assessment, there are considerable gaps in our knowledge in key sectors, many of which arise from the application of inconsistent projections. Research is needed on how to strategically integrate long-term projections into spatial planning and the siting of critical infrastructure, for example.
14. Further practice led research and guidance is required for planning practitioners on matters relating to climate science and its application, climate policy and technologies. While the CAROs have carried out significant capacity building of planners and other local authority staff to date, the rollout of structured national level training across local authority planning departments and planners involved in development projects, with investment in decision support tools for local authority staff in forward planning and development management, is required. Professional institutes in the built environment sector such as the IPI should be supported to provide CPD to their members in areas such as these.
15. The Institute is supporting the Science Foundation Ireland National Challenge Fund: Sustainable Communities project "Resilient Buildings: A National Climate Risk Index for the Built Environment". This is an example of research developed with significant stakeholder engagement which has identified gaps in the understanding of some current and future climate hazards (in addition to better understood flooding).

### **Planning Policy**

16. How development plans might respond to developments in urban climatology, local climate zones and the typologies of local climate, along with an increasing focus on socioeconomic climate risk factors, will require support, guidance and information.
17. The implications for Section 28 guidance which might be updated to mainstream adaptive design measures should be set out in the NAF and any subsequent Planning SAP.

18. Research has emphasised that the planning system is relevant for managing risks associated with flooding, heat (indoor and outdoor), air quality and building fabric<sup>2</sup>. Climate adaptation should be mainstreamed within the full scope of planning policy and implementation. The scope of climate impact evidence to inform regional and county/city development plans should be defined and monitored. Longer term time horizons in relation to mapping vulnerability to climate change should be included in plan-making. This will avoid creating lock-ins in relation to short- to medium-term growth strategies.
19. A series of exemplar design guidelines for adaptation at the urban and building scales should be developed with a target audience of local authority officers, private sector developers, public infrastructure providers and built environment professionals (architects, planners, civil engineers, landscape architects).

### **Planning Sectoral Adaptation Plan (SAP)**

20. Overall, more consideration of how the SAP process integrates mitigation and climate action and addresses the recognised risk of siloisation is required. This is particularly significant given planning's cross sectoral context and why it has been identified as suitable from an SAP rather than being dealt with as a cross sectoral theme in a more structured way is not clear.
21. The integration of spatial planning considerations in future SAPs such as built and archaeological heritage and biodiversity – and building on existing strong links between planning and flood risk management – must be a priority, as must further integration between spatial planning policies and coastal resilience policy.
22. The availability and application of climate data, resources, and difficulties in mainstreaming and engaging other sectors have all been identified as challenges in implementing the current round of sectoral adaptation plans and all of these matters would need to be addressed in advance to ensure the success of any Planning SAP.<sup>3</sup>
23. Regarding the potential for a Planning SAP in the future, as much of the planning system is delivered at local level how such a plan interacts with local government policies and plans is critical while also recognising its cross sectoral character particularly with plans such as biodiversity, coasts, heritage, energy, flood risk management. More information on what it will seek to achieve and early engagement with the sector on this is necessary.
24. Spatial planning is also essential to preventing the health risks of climate change however this is an underdeveloped area and should be explored further in the next iteration of the NAF. How such an issue is addressed in the Health SAP and any future Planning SAP requires articulation at an early stage. How emergency management and Disaster Risk

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<sup>2</sup> Scott, M., Burns, L., Lennon, M. and Kinnane, O. (2022) Built Environment Climate Resilience and Adaptation. Available at: [https://www.epa.ie/publications/research/climate-change/Research\\_Report\\_418.pdf](https://www.epa.ie/publications/research/climate-change/Research_Report_418.pdf)

<sup>3</sup> Climate Change Advisory Council (2013) Adaptation Scorecard. Available at: <https://www.climatecouncil.ie/councilpublications/otherpublications/Final%20CCAC%20Scorecard%20Assessment%20Report%202023%20web.pdf>

Reduction interact with spatial planning policy and development management is also under developed in an Irish context.

25. It is not clear how the urban environment and built environment cross cutting themes proposed are to interact with any Planning SAP and how overlaps will be avoided. Clarity on what the built environment and urban environment themes entail is missing. Also it would appear that the proposed Planning SAP will mean there is not a focus on building standards which are a key aspect of ensuring the resilience of our built environment but which is broadly outside the scope of statutory planning. This should be clarified.
26. Similarly, how Marine Spatial Planning is to be addressed be further considered and proposals for coordinating with the Seafood SAP, for example, as well as the cross cutting coastal theme, made clear.

#### **Nature-based Solutions**

27. The Government's biodiversity action plan, forthcoming Nature Restoration Law etc. will have significant impacts for planning and adaptation policy must reflect such developments. As noted by the Climate Change Advisory Council there is an opportunity to demonstrate types of NbS in decarbonising zones. The adoption of NbS requires a coordinated, evidence led, approach.

#### **Conclusion**

28. The Institute appreciates the opportunity to provide its views as part of consultation. If the Institute can be of any further assistance, please do not hesitate to contact us.

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