

## LAWPRO Submission on the National Adaptation Framework

### Planning for a Climate Resilient

Ireland

2024

19/02/24

To whom it concerns,

The Local Authority Waters Programme (LAWPRO) welcomes the opportunity to make a submission as part of the public consultation process on the draft National Adaptation Framework, Planning for a Climate Resilient Ireland, 2024 under preparation by the Department of the Environment, Climate and Communications.

LAWPRO is a national local authority shared service established to support of the delivery of Ireland's EU Water Framework Directive commitments.

We operate across all sectors providing support for the River Basin Management Plans, through catchment science, community engagement and coordination with the implementing bodies within the RBMP structures set up in support of Ireland's objectives under the EU Water Framework Directive. Considerable engagement also takes place with private industries and research institutes.

Regarding climate change adaptation and mitigation LAWPRO recognises that water is key to planning for a climate change resilient future and has engaged extensively with the CAROs at workshops and in the provision of training and has made submissions to all of the Local Authority Climate Action Plans. Climate proofing WFD objectives is a key focus as we move into the 3<sup>rd</sup> RBMP cycle.

This submission specifically focuses on the **management of water quality** and **flood risk** in the **urban environment**, but we would like to emphasise the need to integrate Climate Change Adaptation and Mitigation across urban, rural and coastal landscapes emphasising nature-based solution and rainwater management planning, including water sensitive urban design where applicable.

LAWPRO requests that the following is included in the final National Adaptation Framework 2024:

- The Flood Risk Sectoral Adaptation Plan (SAP) (Table 4 of draft NAF) comes under the responsibility of the OPW, but this agency has no statutory responsibility for rainfall induced or pluvial flood risk. It is important that the NAF specifically requires the inclusion of pluvial flood risk under the flood risk SAP. As acknowledged in Table 3: Comparison between EU policy sectors for adaptation and 2018 NAF sectors "Urban areas are considered particularly exposed and vulnerable to climate change impact, e.g., increased surface water flooding due the high levels of impervious surfaces".
- As recognised in Table 3 "Urban areas are considered particularly exposed and vulnerable to climate change impact, e.g., increased surface water flooding due the high levels of

impervious surfaces. A number of sectors have assets and activities located in urban areas, therefore urban areas and associated urban impacts should be considered as a specific part of the scoping exercise on potential for a Planning/Built Environment SAP and also as a cross-cutting issue across all SAPs".

LAWPRO welcomes the draft NAF's highlighting of the benefits of nature-based solutions in section 3.6.1.4 and, in particular, the statement that "creating urban green spaces and wetlands not only enhances the quality of life for residents but also mitigates urban storm-water by absorbing excess rainfall and cooling urban areas during heatwaves"

LAWPRO also notes the statement in section 3.6.2.1 that "The alignment between LACAPs and SAPs is of paramount importance to effectively address the challenges posed by climate change".

In support of all of the above, LAWPRO requests that the SAP specifically task the DHLGH and the local authority CAPs with the incorporation of appropriate adaptation plans for urban areas using nature-based rainwater management solutions.

Specifically, page 80 under the section "**Adaptation governance, engagement and resourcing**".

LAWPRO recommend that the language is strengthened in the ambition "Ecosystem-based / nature-based options for adaptation: Employ ecosystem- based or nature-based adaptation options, **where practicable and effective**, to reflect the biodiversity-rich ambition of the national climate objective."

It is important that all public funded projects, at a minimum take a water sensitive design approach (effectively climate proofing from a water perspective) and build in NBS planning at the pre-design phase. There "**where practicable and effective**" is too open to interpretation and justification for business as usual approaches with no ambition. Almost all physical projects can incorporate a NBS approach and where they can't this needs to be justified on technical grounds. They do not necessarily need to be the total solution but where technically feasible they should form part of the solution – ideally for physical projects a "biodiversity net gain should be sought"

The Department of Housing, Local Government and Heritage publication on "Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas - Water Sensitive Urban Design Best Practice Interim Guidance Document 2022", expands on the need to consider "*water sensitive urban design*" at the earliest stages of the planning and design processes.

*"In order to use a water sensitive urban design approach, it is important that, having looked at the urban area in three dimensions and mapped the anticipated rainfall flow patterns, that urban areas are designed to contribute, as far as practicable, to the **retention, treatment and storage of rainwater, prior to its discharge back to the water environment**. Using an innovative approach to urban design, it should be possible to achieve this while also enhancing place making, the use of sustainable transport and the "self-regulated streets" approach promoted by DMURS. While there can be resistance to the use of public open spaces to store excess flows of rainwater, the appropriate sustainable design of such spaces can result in minimal interruption to their normal use as amenities."*

*LAWPRO would encourage that all public funded projects incorporate this approach as part of the climate action planning process.*

We can provide a project example from Carlow County Council that could be included as a visual case study if appropriate; further examples and input available from LAWPRO on request and at our website [Nature-based Solutions - Local Authority Water Programme \(lawaters.ie\)](https://lawaters.ie).

In the context of rural sectoral climate action, LAWPRO is leading out on the €60m WaterEIP a nature-based solutions locally led agri-environmental payments scheme for farmers which may be of interest as a case study [Local Authority Waters Programme - Local Authority Water Programme \(lawaters.ie\)](https://lawaters.ie).

In summary it is our recommendation that the NAP gives a greater emphasis to “water sensitive urban design”, urban rainfall management for flood risk, nature-based solutions greater emphasis within the document in support of Ireland’s River Basin Management Plans, functional urban design, and to assist climate adaptation especially in urban high-density settlements.

*Yours sincerely,*

[Redacted Signature]

**LAWPRO**



**Bioretention Areas (Rain Gardens) – Pollerton Road/Green Lane Junction**

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