



Opening Statement

Regarding the

Review of the National Planning Framework and Climate Targets
by Marie Donnelly, Climate Change Advisory Council Chairperson

to the

Joint Committee on Housing, Local Government and Heritage, 26th
September 2023

Opening Remarks

- 1) Thank you to the Joint Committee on Housing, Local Government and Heritage for the opportunity to attend today and speak on the importance of climate targets as part of the current review of the National Planning Framework. My name is Marie Donnelly, Chairperson of the Climate Change Advisory Council. The Climate Change Advisory Council is an independent advisory body tasked with assessing and advising on how Ireland can achieve the transition to a climate-resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy.
- 2) I welcome this opportunity to have a conversation on the current review of the NPF. The Climate Change Advisory Council noted in its 2023 Annual Review that planning reform will be required to remove barriers to policy implementation across a number of sectors with a need for the new National Planning Framework in particular to better reflect our climate ambitions. The Council welcomes the roadmap published on the revision to the NPF, as provided for in the Planning and Development Act, 2000 (as amended) and the focus on the climate transition, demographics and digitalisation as part of the review.
- 3) The Council also welcomes the Planning Advisory Forum established to input to the evolving policy and legal agenda and will provide any relevant advice on the aspects of the revision relevant to meeting our National Climate Objective over the coming months.
- 4) The Council wrote to Heads of Government in May 2023 in relation to a number of elements of the planning system which will be crucial to address in order to meet our climate ambition on the topics of renewable electricity, spatial development and resourcing of the planning system. In summary the Council noted in its letter;



- The review of the NPF offers an opportunity to rethink how Ireland approaches compact growth, increasing both its ambition and specificity in terms of how it is measured.
 - In relation to decarbonisation of our electricity system, the Renewable Electricity Spatial Policy Framework will be crucial with a need for a plan-led approach to renewable development consistent with national targets.
 - It will be challenging to address the many interdependencies between climate action and planning without addressing historic underfunding of the planning process and ensuring sufficient resources are in place.
- 5) The Council also outlined a number of recommendations in relation to planning policy and decarbonisation in its 2023 Annual Review some of which I will present in brief to the Committee.
- The compact growth target in the current National Planning Framework is insufficiently ambitious in its effort to facilitate the low carbon transition in the transport sector. The review of the National Planning Framework needs to reassess how Ireland approaches compact growth and how it is measured from a spatial perspective. The Council has also noted that more effort is required to ensure that the compact growth target is met across all counties, particularly in the catchment area of cities. As noted by the Expert Group for the first revision of the NPF, even if current objectives can be met, they still allow between 50-70% of all new homes to continue to be built at greenfield locations. The Expert Group has noted that particular attention should be paid to reporting and monitoring progress on this issue which the Council strongly supports.
 - Poor economic incentives for urban brownfield/infill development need to be addressed in order to limit further urban sprawl, along with the development of improved incentives for urban living and the revitalisation of vacant urban buildings. This should be closely linked to principles for transport-oriented development and the regeneration of our towns and cities.
 - In relation to electricity, the Council noted that spatial planning guidance will be required to support the scaled-up deployment of renewable electricity across the country. Local authority climate action plans and development plans will need to be updated in early 2024 to provide for a plan-led approach to renewable



development consistent with national targets. In addition, the Council noted that the new revised onshore wind energy development guidelines should be well articulated to provide clarity for developments and need to be published as soon as possible to support the delivery of onshore wind energy targets.

- In relation to transport, the Council noted that Ireland's transport system needs to make accessible, sustainable transport modes more attractive and shift away from car dependency through consideration of the proximity between people and places in land use and housing planning. Long-term transport emission reductions through the Avoid-Shift-Improve framework and congestion alleviation are closely linked to spatial planning, and measures in this sector should include consideration of settlement patterns to shift travel behaviours. Sustainable residential development can reduce transport demand and can also reduce the cost of provision of low carbon services such as public transport and district heating, along with having co-benefits for air, noise and safety.
- 6) The Council notes that there is a need to ensure that there is an alignment between the Framework and all other related policy documents. Once the NPF review process has concluded, a number of parties across the broader system will be critical to ensure implementation aligns with our climate goals. This will for example include the further development of Regional Spatial and Economic Strategies by the Regional Assemblies, the development of Local Authority Climate Action Plans, City and County Development Plans, Metropolitan Area Strategic Plans and local planning decisions. The Office of the Planning Regulator will also play a critical role in assessment of local authority and regional assembly statutory plans to ensure alignment with the objectives of the revised NPF and to ensure that plans provide for planning and sustainable development.
- 7) Further to the review, it will be important to develop an evidence base to support planning authorities at all levels to quantify the impact of spatial planning policies on greenhouse gas emissions in a consistent way, for example to assess the impact of decisions on transport demand and the impact of time-limited planning consents for windfarms and timelines for repowering on the potential loss of onshore wind capacity. The decarbonisation of our electricity system will require an additional 12GW of onshore renewable wind and solar generation by 2030, which will be essential to reduce costs for



consumers by avoiding imports of expensive fossil fuels and in the decarbonisation of our homes and businesses through electrification of heat and transport.

- 8) The Council also notes the importance of the review of urban boundaries and built-up areas carried out as part of the Census 2022 process which uses a land-use/land cover based definition for the definition of boundaries and is a critical input to evidence based decision making in this area and monitoring urban development into the future.
- 9) Strong political support at all levels will be required, in terms of both ambition setting and in terms of implementation, to ensure the planning system as a whole is aligned with climate goals and ensure that there is strong oversight and implementation of the principles of the NPF. Community engagement will also be essential for critical infrastructure projects, as it promotes transparency, trust and collaboration.

Closing Remarks

- 10) We are now in Year 3 of the first Carbon Budget. Increased ambition and accelerated action are needed if we are to stay within our carbon budget and meet our 2050 target. The National Planning Framework will play a critical role in this regard and the Council strongly recommends that the draft NPF revision and consultation process between Q4 2023 and Q1 2024 further considers our National Climate Objective as a critical area of focus in its proposed changes along with alignment with Ireland's carbon budgets.
- 11) The Council is happy to assist this Committee in its deliberations and in the overall NPF review process and I look forward to our discussions today.

Appendix 1

The Regional Development Monitor (RDM) was developed for the Regional Assemblies to provide data on a range of topics to assess implementation of the RSES and the figures below illustrate the performance of different counties against the overall national compact growth target of 40% (shown in the red line in the figures below)¹ of new housing completions to be within and close to the existing ‘footprint’ of built-up areas. Built-up areas are classed as all CSO settlement boundaries.

As set out on the RDM website², the data for this analysis was provided to the three Regional Assemblies by the Central Statistics Office (CSO) through a specific analysis of new housing completions at the Small Area geography level. Using this data, it is possible to identify all housing completions that have taken place within each local authority for two specific geographies: built-up areas (based on the CSO 2016 Census settlement boundaries n=873 settlements) and other areas not within settlements.

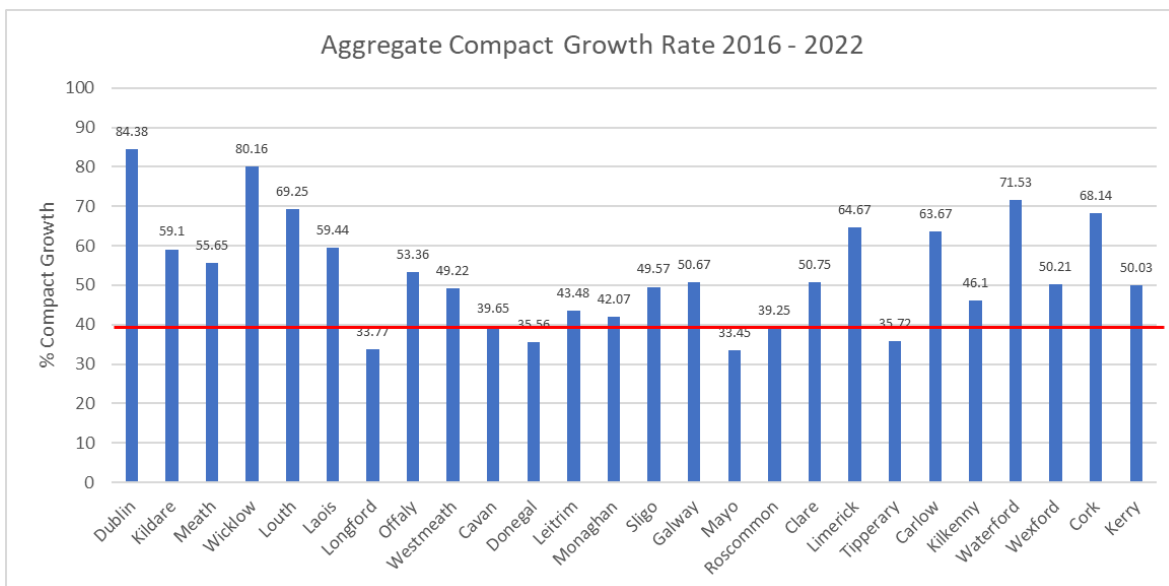


Figure 1 Aggregate Compact Growth Rate 2016-2022 (Source: RDM 2023)

¹ The NPF targets at least 50% of new housing growth in the five cities within their existing built-up footprints. It targets at least 30% of new housing growth in all other settlements, within their existing built-up footprints.

² See: <https://rdm.geohive.ie/pages/our-people-and-places#CompactGrowth>

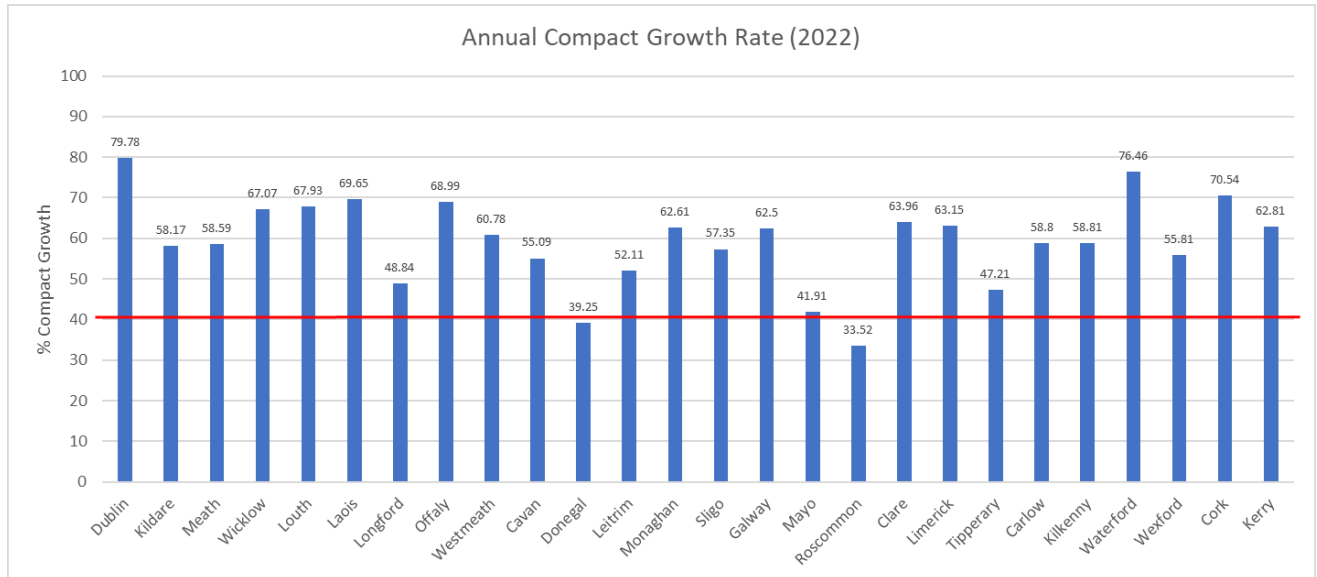


Figure 2 Annual Compact Growth Rate for 2022 (Source: RDM 2023)