

Taoiseach Leo Varadkar TD, Tánaiste Micheál Martin TD &
Minister Eamon Ryan TD
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CC: Darragh O'Brien, Minister for Housing, Local Government and Heritage

9th May 2023

Dear Taoiseach Leo Varadkar TD, Tánaiste Micheál Martin TD and Minister Eamon Ryan TD,

RE: Planning Policy and Decarbonisation

As we approach the mid-point of the first carbon budget, the Climate Change Advisory Council remains concerned that the timelines for delivery of core measures within the Climate Action Plan are not progressing fast enough. In particular, we wish to highlight a number of elements of the planning system which will be crucial to address throughout the remainder of 2023.

Planning and Decarbonised Electricity

The electricity sector has a particularly challenging sectoral ceiling with a target of a 75% reduction in emissions by 2030. The quantity of planning applications necessary to achieve the Climate Action Plan 2023 targets (e.g. 9GW of onshore wind), along with the essential expansion and upgrading of the electricity grid, represents a significant challenge to the planning system. In addition, the Council is concerned that many of the older fleet of onshore wind farms are due to lose their planning consent before 2030. In line with the European Commission's REPower EU plan, barriers and administrative burdens to the extension of consents for existing wind turbines and repowering of sites should be urgently removed.

The Council has reviewed Local Authority Renewable Energy Strategies' contribution to Ireland's 2030 Renewable Electricity Targets¹ which highlights the capacity of a given region or county to increase wind generation. To support scaled up deployment of renewable electricity across the country, the Renewable Electricity Spatial Policy Framework is crucial and should be published by September 2023 at the latest. Equally, Local Authority Climate Action Plans and Development Plans will need to be

¹ McGookin (2023) Reviewing Local Authority Renewable Energy Strategies' contribution to Ireland's 2030 Renewable Electricity Targets. Available at: [Council Working Paper Series | Climate Change Advisory Council \(climatecouncil.ie\)](#)

updated in early 2024 to provide for a plan-led approach to renewable development consistent with national targets.

Planning and Spatial Development

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. Higher levels of active travel and less time and money spent on transport can also support a higher quality of life for families and individuals in such communities. The compact growth target in the current National Planning Framework is insufficiently ambitious to achieve the low carbon transition in the transport sector² and more effort is required to ensure that the existing compact growth target is met across all counties, particularly in the catchment area of cities.

The Council welcomes the review of the National Planning Framework due to begin this year and urges a better alignment with our climate goals. This review offers an opportunity to rethink how Ireland approaches compact growth, increasing both its ambition and specificity in terms of how it is measured.³ Addressing the poor economic incentives for urban brownfield/infill development, the foundation of compact growth, is an important support for affordable housing policy. In the context of ongoing efforts to deliver more housing rapidly, the progression of the Land Value Sharing and Urban Development Zones Bill is also crucial for the low carbon transition along with the adoption of modern methods of construction.

Resourcing of the Planning System

The Council is concerned that it will be challenging to address the many interdependencies between climate action and planning without addressing historic and structural underfunding of the planning process. Ireland's planning service is significantly under-resourced⁴ in particular at the local authority level. The Council strongly supports an urgent increase in staffing in local authority planning offices to help effectively deliver national climate policy.

The Council also supports the rollout of structured national level training across local authority planning departments with investment in decision support tools for local authority staff in the preparation of development plans and planning decisions. It will be important to enable quantification of the impact of decisions on greenhouse gas (GHG) emissions in a consistent manner.

² OECD (2022) Redesigning Ireland's Transport for Net Zero: Towards Systems that Work for People and the Planet, OECD Publishing, Paris, <https://doi.org/10.1787/b798a4c1-en>

³ A target based more clearly on brownfield and infill development (while maintaining urban public amenity and greenspace) should be considered in a review of the NPF. In 2022, 68% of new dwelling completions were within CSO settlement boundaries. Source: <https://data.cso.ie/table/NDA06>.

⁴ Following a series of interviews with planners discussing the integration of climate action into CDPs, it was found that there is a critical resource, capacity and knowledge gap at present. See: Revez, A., et al., Climate Action and the Local Authority Development Plan, in Office of the Planning Regulator, Case Study Paper CSP05. 2022

The Council welcomes the publication of the Draft Planning and Development Bill which aims to rationalise the legislative framework for the planning system, however is very concerned by the continuing backlog of cases awaiting a planning decision. It is essential that the planning process performs efficiently for all its users by providing clear and effective forward planning which supports the achievement of our climate goals and specific targets in each sector. A refined planning process must ensure coherence and clarity of approach across the different key policy areas including housing supply, climate action, protection of natural and public resources and public safety matters. The interpretation and implementation of planning policies from national to regional and local levels must be clearly set out.

The Council again emphasises how fundamental the planning system is to the delivery of our climate goals and looks forward to providing any further assistance or advice as required or useful to Government⁵.

Regards,

A handwritten signature in black ink that reads "Marie C. Donnelly". The signature is written in a cursive style with a large initial 'M' and 'D'.

Marie C. Donnelly

Chair of Climate Change Advisory Council

⁵CCAC Secretariat (2023) Planning Policy and Decarbonisation. Available at: [Council Working Paper Series | Climate Change Advisory Council \(climatecouncil.ie\)](https://climatecouncil.ie/Council-Working-Paper-Series)