



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

Deputy Stephen Matthews

Chair Joint Committee on Housing, Local Government & Heritage

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Cc Anne Marie Lynch Clerk to the Committee

Dear Stephen

On behalf of the Office of the Planning Regulator, I wish to thank the Committee for your invitation to discuss the Review of the National Planning Framework and Climate Targets.

Given the time constraints, I will make a few short introductory remarks and would be happy to take questions from the Committee.

To begin, the OPR strongly welcomes the Review of the NPF and the opportunity to build on its many successes based on our learnings from the practical implementation of the framework.

Since the publication of the NPF, the interaction between planning and climate policy considerations has deepened. This extends far beyond renewables, district heating, public transport, walking and cycling infrastructure, and flood avoidance; but crucially to the need for a compact pattern of growth that reduces land take, car dependency, and the need for energy intensive infrastructure. Without getting all of these things right we will not be able to meet our climate targets.

The OPR has specific statutory functions under the Planning and Development Act to oversee the implementation of the NPF by local authorities in their statutory plan-making functions, with a particular emphasis on the climate aspects. This has not been without its challenges and we welcome the greater clarity provided in the draft Planning and Development Bill regarding our ability to ensure that local and regional plans are consistent with the NPF.

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Since our establishment, the OPR has made 16 recommendations to the Minister to issue a Direction, all of which in whole or in part related to climate action including renewable energy, compact growth, flooding, and sustainable transport and mobility.

These issues are often contentious, most obviously in relation to wind energy; but we have also seen litigation by land owners in relation to limitations on the zoning of land at risk of flooding and in locations which do not support compact growth or more sustainable transport options.

The importance of clear policy frameworks to deliver on sustainable development objectives and a move towards rule-based systems is evident.

While the updated census data is timely to ensure that development plan housing and population targets are appropriate, we consider that the overall strategy in the NPF for more balanced regional growth, targeting our main cities and towns is well aligned with our climate targets. The emphasis on renewing and consolidating existing settlements rather than continual urban sprawl into the countryside is also crucial.

There are, however, areas that the NPF Review should focus on to better deliver on climate targets.

Firstly, the framework relating to **compact growth** and land use change needs significant refinement and development to address the definition of compact growth, which is currently too expansive; review targets so that they are better aligned with achieving the 2030 targets for GHG emissions, and include separate targets for land reuse and intensification (brownfield development and infill/ densification).

As difficult as it is, the review of the NPF must also address the current reality that more than a fifth of all new homes are made up of individual houses in areas dependant on the private car. This makes achieving our transport targets very challenging.

Looking more broadly at the targets for **transport**, there have been significant policy developments arising from the climate action plans. It is important that the NPF review provides a strong and renewed policy framework consistent with these developments, with particular emphasis on increased walking and cycle networks in strategic locations.

Fundamentally, compact growth is also crucial to meeting transport targets – the further homes are from schools, shops, facilities and amenities, the less chance people will walk or cycle.

The framework for the spatial location of employment lands should also be strengthened in terms of alignment with the CAP transport targets. Proximity to high quality public transport is fundamental in this respect.

In relation to **renewable energy**, a clear plan-led and coordinated approach is needed as to how local authorities are expected to contribute to meeting the CAP target of 80% renewable electricity at a local level. The Renewable Electricity Spatial Policy Framework

currently being prepared by the Department of Energy, Climate and Communications Policy under the CAP 2023 (Action EL/23/2) should, in particular, be supported in the NPF.

Similarly, while the NPF acknowledges the role of **District Heating**, a clearer policy framework would be beneficial. District heating can only happen at scale if it is planned for in development plans.

Of course, making policy is just the first step, it is the implementation where real progress will be made. In this respect the review of the NPF should deliver:

- clear identification of the key National Planning Objectives (NPOs) aligned to climate targets;
- NPOs that facilitate clear, consistent implementation in certain key areas, providing a clearer set of “rules” for the OPR as “referee” in a more evidence based, plan-led planning process;
- better structures (& ICT systems) for spatial data gathering to monitor implementation of those NPOs; and
- a clear governance structure to reflect that fact that NPF implementation requires a broad coalition of actors, working together in relation to NPOs relevant to climate targets.

In summary, having a National Planning Framework that delivers a plan-led and climate centred approach is crucial if we are to step away from the business as usual approach of following developer and market led pressures that will exacerbate sprawl, deepen congestion and environmental issues, and lock-in high energy needs and carbon intensity.

With some careful revisions the NPF will be a strong agent for meeting our climate targets.

Should the Committee wish to further engage with the OPR on any of the above, we would be happy to assist in any way possible.

OPR

September 22nd 2023