

Opening statement by Irish Planning Institute (IPI) to the Joint Committee on Housing, Local Government and Heritage to discuss a Review of the National Planning Framework and Climate Targets for the Department of Housing, Local Government and Heritage

22 September 2023

1. I would like to thank the Chair and Committee members for offering us the opportunity to meet you today on the National Planning Framework (NPF) and climate targets. I am Gavin Lawlor MIPI, Vice President of the Irish Planning Institute. I am accompanied by Dr Seán O'Leary MIPI, Senior Planner with the Institute.

Overview

2. 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.¹ Climate action, sustainable development, the achievement of the SDGs and the centrality of the planning system in achieving them should be more explicit throughout the NPF and also future climate action plans.
3. The Institute welcomes the review of the NPF² but this cannot delay essential progress in delivering both compact growth and renewable energy priorities. Both the NPF and Climate Action Plan 2024 (CAP24) would benefit from strengthening the commitment to balanced regional economic development which is central to national and regional policy. This must be underpinned by the required level of infrastructure investment, project delivery (especially enhanced inter-regional connectivity across multi-modal transport, digital connectivity and energy grid) and skills development.
4. We agree with the Expert Group for the First Revision of the NPF, that the revised NPF should seek to name the principles for identifying priority locations for the deployment of infrastructure – including that necessary for decarbonisation – at a strategic scale across the country.³ The absence of mapping – including of potentially overlapping or competing policies, designations, objectives etc. – was identified as a weakness in the NPF at draft stage by the Institute, and we would support addressing this. The NPF also requires a strategy for delivering infrastructure such as port and harbour infrastructure capacity to develop, service and maintain offshore renewables capacity and supply chain economic activities. A plan-led coherent approach must extend to corridors for infrastructure for connections to the grid for both onshore and offshore renewables to prevent a piecemeal approach to the application, consenting and delivery of individual connections to the grid.

¹ Representing over 1,000 planners on the island of Ireland across the public and private sectors, 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.

² The IPI is a member of the Planning Advisory Forum reconstituted by Minister O'Donnell as part of this process.

³ Report of Expert Group for the First Revision of the National Planning Framework (2023). Available at: <https://www.gov.ie/en/publication/1924f-report-of-expert-group-for-the-first-revision-of-the-national-planning-framework/>

Renewables

5. For all renewables, onshore and offshore, it is critical that policy provides a clear pathway for industry and communities and that it retains and provides confidence and certainty to all stakeholders in the current system.
6. The revised wind energy guidelines are urgently needed. Planning Policy needs to be specific about noise standards for wind turbines to ensure that both the communities that might be affected, and the developers of wind energy infrastructure, know the criteria expected, while recognising the need for appropriate flexibility within defined parameters. After demonstrating good design, an application still needs to be assessed for context specific impacts. In general, planning legislation and policy also needs to consider the rapid pace of technological innovation. The overdue National Landscape Character Assessment is also essential to address some potential conflicts and inconsistencies in dealing with renewable considerations. The need for a national wind energy strategy that has been subject to SEA and that is mapped to a sufficient scale is essential.
7. REPowerEU discusses the possibility of having 'ready to go areas' for renewable energy meaning areas which could avail of a streamlined process. In an offshore context this requires that designating marine protected areas should be prioritised and resourced to ensure certainty (what is protected, what is not, with data available). There should also be consideration of introducing a presumption in favour of renewable energy production in development plan zoning objectives and climate action measures in development management.
8. More consideration should be given to locating renewable development on brownfield sites such as industrial areas that have capacity to absorb it. The revised NPF also needs to engage with the strategic national approach to a range of decarbonisation technologies such as biogas, hydrogen and anaerobic digestion.

Compact Growth and Transport Orientated Development

9. The Institute is currently preparing a submission on the draft Sustainable and Compact Settlement Guidelines which are out for public consultation. Transport oriented development is key and the IPI believes that there should be a greater focus on retrofitting the existing urban environment to enhance connectivity and permeability. Investment in a particular mode of transportation is only of benefit where it can be demonstrated that its usage will also increase. All new developments should provide for optimum levels of connectivity and permeability, particularly for pedestrians and cyclists, through smart design.
10. However, while addressing mitigation priorities, compact growth should also recognise climate impacts, particularly those associated with increased impermeable surfaces, building design in relation to indoor solar gain as well as microclimate impacts etc. and the use of Green Infrastructure to address flood risks and overheating.⁴

⁴ 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

Policy Alignment and Resourcing

11. The planning system is central to dealing with both the legacy of unsustainable, carbon intensive, development and delivering the strategically critical infrastructure required to meet our climate targets, all at a time of significant population growth and housing demand, but there will be significant challenges to meeting our Carbon Budgets without an appropriately resourced planning system that is equipped to implement reformed legislation.
12. The alignment of public policy is a key issue. The ambition of the National Climate Objective and the implications of Carbon Budgets have not yet been fully mapped into planning policy and practice and the hierarchy of planning policies needs to be better aligned to meet mitigation and adaptation goals. The implications of carbon pricing for the planning system and the role of planning authorities in quantifying the impact of decisions on GHG emissions in a consistent manner requires engagement with practitioners. It is also unclear also how the 2022 Permitting Regulation⁵ was reflected in national guidance and the planning system must also be prepared for the amended Renewable Energy Directive which reflects the ambition of this Regulation and REPowerEU.⁶
13. The planning policy hierarchy requires different levels of the planning process to address climate change, however the implications of the forthcoming Local Authority Climate Action Plans on recently adopted Development Plans remains unclear. The forthcoming Renewable Electricity Strategy, Regional Renewable Electricity Strategies, Local Authority Renewable Energy Strategies and accompanying methodology will create a complex framework which will be challenging to integrate into existing plans and policies, particularly given current resource constraints.
14. Our members are well aware of the national and European and International obligations Ireland now has to address the climate and biodiversity crisis (including the impending adoption of the Fourth National Biodiversity Action Plan) and want to ensure policy and decision makers reflect these. However, this also requires the support of others to tackle misinformation and creating a stronger sense of the common good amongst communities – elected representatives have a key role to play in this.
15. The plan making process provides excellent vehicles for community engagement and education for climate action and sustainable development. Constructive engagement with communities who may have legitimate concerns regarding decarbonisation interventions and projects is required at a much deeper level than heretofore.

Conclusion

16. We are happy to address any questions that the Committee may have. Should you wish to further engage with the Institute on any aspect of today's discussion, we would be happy to assist in any way possible.

⁵ Council formally adopts regulation to speed up permits for renewable energy projects (2022). Available at: <https://www.consilium.europa.eu/en/press/press-releases/2022/12/22/council-formally-adopts-regulation-to-speed-up-permits-for-renewable-energy-projects/>

⁶ Available at: https://www.europarl.europa.eu/doceo/document/A-9-2022-0208-AM-081-081_EN.pdf