

Aarhus, Climate Adaptation and Citizen Engagement Division
Department of Communications, Climate Action and Environment
29-31 Adelaide Road
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[By email to NationalAdaptationFramework@decc.gov.ie]

12th July 2022

A Chara,

Re: Consultation on Review of the National Adaptation Framework (NAF)

The Irish Planning Institute welcomes the opportunity to provide comments to the public consultation on the review of the National Adaptation Framework. The Irish Planning Institute is the all-island professional body representing planners engaged in physical and environmental planning in Ireland.

The Institute wishes to comment on the following aspects of the existing adaptation regime under the NAF which it considers should be addressed in any future Framework.

It is of critical importance that the NAF is consistent with the policies of the **National Planning Framework**. Great care needs to be given to ensure that consistency is carried through in the hierarchy of plans, from national to local level. The current NAF and plans and strategies under it have lacked clarity in terms of the exact relationship between these strategic policy documents. Consideration should be given to how spatial planning at national, local and regional level is represented in national adaptation governance structures.

Any future NAF, and sectoral adaptation plans under it, must be more effective at assessing **future vulnerabilities** arising from future shape and demography of Ireland in a changing climate, explicitly taking into account the **spatial implications of the National Planning Framework**, for example.

Any **revised guidelines** for sectoral and local adaptation (including guidelines for local climate plans addressing adaptation and mitigation as required under the 2021 Amendment Act) must be consistent with planning guidelines issued under the Planning and Development Acts (while cognisant of any potential changes to plans, guidelines, the duration of plans etc. arising from the ongoing planning legislation review.) This includes the recently published *Development Plans Guidelines for Planning Authorities* and also requirements for decarbonising zones. The Institute also recognises the recommendations of the Climate Change Advisory Council in its Annual Review 2021 regarding the need for Government guidelines to emphasise the vital role that spatial planning can have with regards to adaptation and resilience in the face of future changes.

However, the funding and capacity constraints in local government also identified by the Climate Change Advisory Council mean that such a role must be supported by additional resources at regional and local levels and may require specialist skillsets for planners. Accordingly, a **Resource Impact Assessment** should be carried out in relation to any further roles proposed for local or regional planning functions following this review of the NAF. Such resource constraints are reflected in the survey work undertaken for the recent EPA funded BE-Resilient project.

Furthermore, as noted by the Climate Change Advisory Council, the Institute would question the need for all future local or sectoral plans to be **adopted at the same time**. This makes the job of statutory

bodies, and organisations with a national remit, who may wish to give input on a significant number of plans very difficult and is a challenge for those seeking to ensure coherence across spatial plans and adaptation plans.

Though the work of the Climate Action Regional Offices in **capacity building** is recognised, the effectiveness of spatial planning measures to contribute to climate change adaptation and mitigation can be further developed and lacks an evidence-base for policymakers. Further institutional capacity building, including continuing professional development and further research, in order to enhance the ability of the planning system to deliver a more climate resilient built environment is required. An ever-increasing challenge for spatial planners will be to understand climate change vulnerability and impacts and to develop and implement spatial policies to ensure effective adaptation.

The Institute supports the Climate Change Advisory Council's view that the current NAF and sectoral approach does not fully address all aspects of **coastal change** that may be expected due to climate change.

It is also critical that a **common set of climate projections** that capture the range of change in future climate projections should be developed for Ireland for use in adaptation, infrastructure and investment and forward planning to 2050 and beyond and that these link with other modelling conducted as part of plan making.

The current NAF does not provide an explicit role for spatial planning to provide a more long term and strategic approach towards protecting critical infrastructure and requiring **integrative approaches** to transport, regional development, industry, tourism and energy policies.

The Institute looks forward to the recommendations arising from this consultation on the review of the NAF and national adaptation priorities for the coming years.

Is mise,

Sarah Newell MIPI

Hon. Secretary
Irish Planning Institute