IGBC
IRISH GREEN BUILDING COUNCIL

NATIONAL PLANNING FRAMEWORK CONSULTATION DRAFT IRISH GREEN BUILDING COUNCIL'S SUBMISSION

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1 CHP 1: THE VISION

The IGBC welcomes the revision of the 2018 National Planning Framework (NPF). This long-term, strategic framework provides an opportunity to move away from "business as usual", and to **embed good spatial planning in all relevant policy areas**.

It is extremely positive that the document acknowledges the need to take into account demographic projections and trends, as well as recent economic, social, and policy developments, including climate targets. The IGBC strongly supports the ambition of creating **a single vision and a shared set of goals for every community across the country**. This may be best achieved by setting up a Citizens' Assembly on housing and climate action, to raise awareness about these issues and build a consensus around what might be perceived as more contentious policies such as re-use. The **continued emphasis on renewing, developing, and densifying our existing settlements, rather than allowing the continual expansion and sprawl of cities and towns out into the countryside, is also welcome**. However, considering that what is built today will impact how people live for many decades, we strongly believe that **the targets remain unambitious and need to be better defined, to avoid locking-in households into carbon-intensive lifestyles**. More specifically, and in line with the Report of Expert Group for the First Revision of the National Planning Framework (2023), we believe that the revision of the NPF should **consider stronger and more ambitious targets for compact growth**. Furthermore, in addition to looking at location and density of new homes, there is a need to focus on more qualitative indicators around residential use and mix use [1]. While it's positive that the future planning and development of our communities is being refocused to better address environmental crises, **a holistic approach to tackling carbon emissions is critical to tackle Ireland's higher than average carbon-intensity per capita**. With that regard, the revision of the NPF should not only be used to address transport and building operational emissions but also embodied carbon emissions. This

[1] The Home Performance Index Technical Manual, and more specifically indicator EN 2.2: Residential Mix and the Sustainable Location section (3.5) could inform the development of these indicators.

approach would support 6 of the 10 shared goals (national strategic outcomes) i.e., compact growth, sustainable mobility, strengthened rural economies and communities, a strong economy, transition to a low carbon and climate resilient society, as well as sustainable management of water, waste and other environmental resources.

2 CHP 2: A NEW WAY FORWARD

Section 2.6 - Securing Compact and Sustainable Growth:

The document acknowledges that the "physical format of urban development in Ireland is one of our greatest national development challenges", with the fastest growing areas continuing to be at the edges of and outside our cities and towns, leading to a significantly higher carbon footprint than the EU average.

In addition to the impact on transport emissions and energy use mentioned in the document – p. 21, it's worth noting that this type of development also has a significant impact on embodied carbon emissions*.

National policy objectives 7, 8, 9, and 10 are not ambitious enough to support compact growth and need to be better defined, to avoid locking-in households into carbon-intensive lifestyles. These targets cannot deliver compact growth, because even if these objectives are met, they allow between 50% and 70% of all new homes to continue to be built at greenfield locations (i.e., beyond the edges of settlements). As highlighted in 2023 by the Expert Group for the First Revision of the National Planning Framework, this means that unsustainable greenfield development at this scale across the country in the years ahead could be said to be consistent with the current targets in the NPF. At least in theory, and likely in practice, this allows county and city development plans (and individual project approval decisions) to depart from national 'compact growth' principles at a significant scale. This situation is made worse by the current definition of 'existing built-up footprints', which are linked to CSO mapping boundaries that encompass substantial amounts of undeveloped greenfield land in and around the edges of cities and towns. Furthermore, and without appropriate support, there is a risk that all the "easy to develop" greenfield land are built first.

The IGBC strongly supports recommendation number 2 of the expert group, i.e., to review the current targets and consider stronger and more ambitious targets for compact growth. Alternative targets, such as densification targets for urban areas (including mature suburbs), **or reduction in soil sealing** (which has a negative impact on climate, biodiversity and flooding risk, etc.) as implemented in France **should be considered**[2]. Furthermore, funding mechanisms must be improved to incentivise developments on brownfield and in existing built-up footprints. More specifically, in a

[2] The Law n°2021-1104 of August 22, 2021, on combating climate change and strengthening resilience to its effects, NOR: TREX2100379L (https://www.legifrance.gouv.fr/jorf/id/JORFTEXT0000439569242021) aims to achieve a reduction in the consumption of natural, agricultural and forest areas by 50 % in 2030 (compared to the previous decade), and to achieve the goal of 'Zero Net Artificialization' ('ZAN') by 2050.

climate and biodiversity emergency, where government invests in housing through grant aid or procurement from private sector, these developments should adhere to higher sustainability requirements, including a wider range of objectives such as addressing whole life carbon emissions and reducing transport requirements, climate adaptation, and biodiversity[3].

Finally, while the IGBC support objective 10, we believe better definitions are needed. For instance, "suitable locations" need to be clearly defined to ensure consistency of approaches across local authorities, and avoid unintended consequences. The **inclusion of a glossary** to clarify the meaning of these terms would be helpful. We are also unclear why a reference to "a proportion of post-2030 growth (+200,000 people) is specifically targeted for Transport Orientated Development within the Dublin metropolitan area" is included in Chapter 10. With a growing population, growing transport emissions, and so many homes to be developed by 2030, we cannot afford to wait till 2030 to transition to this model, or for this model to only be applied to "a proportion of developments".

*For instance, a study we commissioned from a group of researchers in UCD in 2022 shows that the carbon cost of a home deep retrofit (BER B2) across its whole life cycle is approximately a quarter of that of a new build. Read more: WLC-UCD-IGBC_30.09.22_V4.0_MidRes.

Another report worth reading is Viable Homes - Guidelines for planners on the design and building of low carbon, low rise, medium density housing in Ireland - V1.0 (igbc.ie). It shows that significant decreases in carbon emissions could be achieved by rethinking the use of carbon-intensive construction materials in our dwellings, and by adopting planning approaches that minimise car-parking, new roads, and infrastructure. For instance, greenfield housing developments outside towns and cities can contribute up to 30% more embodied carbon per home than equivalent infill developments that use existing infrastructure. The guidance document also highlights that connected dwellings such as terraced houses, lead to a consistent reduction in terms of carbon emissions. A side gable wall, which is typically found in semi-detached houses, generates approximately 4-5 times more embodied carbon per square metre than a party wall between dwellings on a terrace.

Section 2.7: Translating the NPF to City and County Levels

The IGBC fully support a plan-led approach to NPF implementation at regional and local levels. However, **a full review of our existing stock to evaluate what is available for use and where, and to assess what additional space and building types may be needed**, should be completed first.

[3] This is already done in Germany for all KfW funded projects.

3 CHP 4: MAKING STRONGER URBAN PLACES

The IGBC fully supports the national policy objective 12: Ensuring the creation of attractive, liveable, well-designed, high-quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being. However, the objective is vague and it will be important to define how this can best be implemented. More specifically, **bringing Ireland's very high levels of vacant, derelict, and suboptimal use of space* back into more intensive use across the country must be a national priority**. Bringing back these properties into use through high-quality renovations is the best and most cost-effective way to address both operational and embodied carbon emissions in the built environment, as well as transport emissions. It also represents a unique opportunity to make our city, town and village centres more vibrant, to enhance air quality, and to restore the cultural and aesthetic value of these areas.

The IGBC also welcomes the focus on quality design and placemaking (objective 14), as well as on the mix and distribution of uses, the protection and enhancement of green and blue infrastructure, and responsive built form. However, it will be important to define how this can best be implemented and to provide tools to planning authorities to improve the consistency of approaches. Useful tools include the Home Performance Index Technical Manual, and more specifically indicator EN 2.2: Residential Mix and the Sustainable Location section (3.5), as well as circular economy statements for new development, and pre-redevelopment audit and pre-demolition audits as already in use in London.

4.3 Planning for Ireland's Urban Growth: The IGBC fully supports the overall objectives of strengthening Ireland's urban structure, and of reversing the decline of many smaller urban centres, as well as of addressing the legacy of rapid unplanned growth in expanded commuter settlements (objective 15). Reaching these objectives will require a comprehensive and coordinated set of actions, including robust and consistent planning policies, and appropriate financial mechanisms. Furthermore, this section should include clear objectives and strategies for older suburbs where many homes are under-used, and the potential for densification and diversification of the stock – e.g., to support downsizing, is significant.

4.5 Achieving Urban Infill/ Brownfield Development:

- The reference to delivering "a significant number of homes on State lands in major mixed tenure developments, with a particular focus on brownfield and infill urban sites" (National Policy Objective 21) is too vague and needs to be strengthened. In a climate and biodiversity emergency, this type of development must become the new norm.

- The IGBC supports the use of "performance-based criteria" for planning building height and car parking in our city/town and village centres (objective 22). However, this performance-based criteria must take embodied carbon and transport emissions into account. The SEAI is developing a national methodology to measure embodied carbon emissions which will be launched in 2025 – Climate Action Plan, and mandated for new

buildings from 2027 - Energy Performance of Buildings Directive – 2024 Recast. In the interim, planners could use the Guidelines for planners on the design and building of low carbon, low rise, medium density housing in Ireland produced as part of the Construct Innovate Viable Homes project. This includes simple, high-quality data on the carbon intensity of various development types. In relation to car parking requirements, clear and consistent guidelines/enforcement are needed to avoid unintended consequences – e.g., developments happening in counties with the lowest requirements. More specifically, the requirement for car parking space per dwelling should be set to zero by default in city centres and urban neighbourhoods, with applicants required to provide a rationale and justification to include any car parking spaces[4]. A recent study by the city of Lille in France shows that a car in an urban area requires an average of 65 sqm, significantly impacting the delivery of high-quality public realms and other services such as SUDs. Furthermore, while the number of car parking spaces should be significantly limited, in all new developments, most of car parking should be grouped together, as opposed to being provided within the curtilage of the home. This would make it easier to reclaim the land used for car parking as public transport and active travel services are improved and cars become less needed. **In simple terms, the performance-based criteria must be fully aligned with national carbon targets**. Finally, we would recommend commissioning a study to review the impact on Whole Life Carbon emissions caused by different zoning decisions (e.g., considering ground conditions, carbon sequestration, infrastructure, and parking requirements), so that it can be considered as part of zoning and planning permission decisions.

* CTCHC land use surveys (Step 2 of a 15- Step assessment process) highlight that the ground floor commercial vacancy rate in towns in Ireland is 18- 31% – the normal target at a European level is 5%. The upper floors in towns are at c. 80% - both these levels are unheard of in a European context. Source: CTCHC Programme, June 2022.

4 CHP 5: PLANNING FOR DIVERSE RURAL PLACES

The IGBC strongly supports objective 25 and the need to reverse the decline in the core of small towns and villages through sustainable targeted measures addressing vacant premises and delivering sustainable reuse and regeneration outcomes. This requires ambitious and coordinated policy measures to improve public realm, and address barriers associated with planning and building regulations*, financing mechanisms, and the lack of data. Focusing on these areas would also facilitate a more effective use of existing infrastructure and contribute to a reduction in transport emissions.

Some of the other objectives included in this chapter e.g., objective 29, could have a negative impact on the delivery of objective 25 and lead to further sprawl, preventing Ireland from reaching its climate targets. More specifically, **objective 29 through the facilitation of the provision of single housing in the countryside will**

[4] The 2022 Census already shows a high percentage of households living without a car in Cork, Dublin, Limerick and Waterford. E.g., 82% in Dublin North City electoral division and 71.4% in Cork Centre A electoral division.

result in further sprawl and carbon leakage. Large, detached homes are associated with higher operational and embodied carbon emissions and with higher transport emissions. Although the inclusion of objective 30, and the acknowledgment of the need for better data is positive**, the objective for single housing should be set to zero by default, with applicants required to provide a rational and robust justification (and data - including on embodied carbon and environmental impact) for development. This is aligned with recommendation number 3 of the Expert Group for the First Revision of the National Planning Framework which highlighted that the revision of the NPF should consider the inherent unsustainability of scattered, uncoordinated patterns of new houses in the countryside and explore how to develop a new national strategic objective to direct new rural housing towards rural towns and villages.

On the development of the rural economy (objectives 31 and 33), we would suggest a greater focus on the development of the bio-economy. Ireland with a large agricultural sector has a strategic interest to identify, encourage, and develop local low-carbon biobased solutions from agriculture and forestry for construction and renovation. As measurement of the global warming potential of new buildings across their life-cycle will be mandated in Ireland and across the European Union from 2027, a greater demand for biobased construction materials is to be expected***. Financial incentives should be introduced, or the state should directly fund production facilities (and certification) for biobased construction materials (e.g., CLT, sheep's wool, hemp, and straw), as it was done in Scotland to support the development of natural fibre construction insulation. E.g., through an accelerator scheme. Strategic government investment in production or risk sharing aiming to create large export orientated industries (building on success of industries such as Coillte's MediteSmartply) should be explored. This could start with feasibility studies such as one developed in 2022 by DAFM for wool production, extending to other potential construction materials such as CLT, industrial hemp, straw, and other agricultural fibres, as well as exploring the potential of newer bio-based materials such as mycelium. These industries will only likely gain traction with significant state involvement through investment and engagement with the agriculture sector.

*The IGBC in partnership with UCD is about to start a Construct Innovate project looking at the perceived and actual Building Regulation impediments to re-use of existing buildings. The project will develop mitigation recommendations – to be published in Oct. 25.

** We believe that a full review of our existing stock to evaluate what is available for use and where, and to assess what additional space and building types may be needed is urgently needed.

***Anecdotal evidence gathered from our Green Building Council colleagues in countries where whole-life carbon in the built environment is already regulated – e.g., France and the Netherlands, show a greater demand for this type of materials.

5 CHP 6: PEOPLE, HOMES AND COMMUNITIES

The IGBC welcomes the holistic approach to health taken in the document, including the acknowledgment of the strong links between land use and buildings and air and water quality, traffic safety, physical activity, and social interactions.

Objective 37 may need to be strengthened as "where appropriate and at the applicable scale" is too vague. The use of some of the Home Performance Index indicators listed under environment, health and wellbeing and sustainable locations sections could support with the integration of these policies.

The inclusion of objective 38 focusing on the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages is highly welcome, but may not be compatible with objective 29, and requires strengthening objectives 7, 8 and 9.

Under section 6.4 Age Friendly Communities, we would suggest highlighting the need for future-proofing new homes being built for an aging population. I.e., through the inclusion of stronger requirements for adaptability and universal design – see Home Performance Index indicators EC 3.0 – Universal Design and Adaptability, 3.1 and 3.2[5]. This is also key in supporting circularity and addressing carbon emissions – see comments on chapter 9.

Section 6.6 on Housing is comprehensive, and we welcome the focus on sustainable location (objective 44), adaptability (objective 45), and re-use and densification (objective 46). However, part of the wording needs to be strengthened. For instance, **under objective 44, it should be more than "prioritising the provision of new homes at locations that can support sustainable development".** In a climate and biodiversity emergency, all new homes built in Ireland must not only be highly energy efficient, but they must also be well located and built in a sustainable manner to address both operational and embodied carbon emissions. This would ensure that new homes are cheaper to run, improve people's quality of life, and contribute to better use of scarce financial and human resources.

We welcome the inclusion of objectives 47 and 48 on the need for high-quality data on housing needs to correlate and accurately align future housing requirements. It's also positive that the opportunity for reuse of the existing building stock must be accounted for and considered as part of any evidence basis for housing policy formation (p.90). However, we believe that more is needed in this area. In particular, a full review of the existing stock to evaluate what is available for use and where, and to assess what additional space and building types may be needed is required. The mix of home sizes

[5] These indicators are based on the recommendations of the Government Policy Statement - **Housing Options for our Ageing Population,** A joint policy statement "Housing Options for our Ageing Population" was launched in February 2019 by Mr. Jim Daly TD, Minister for Mental Health and Older People with Mr. Damien English TD, Minister for Housing and Urban Renewal.

needs should also be re-evaluated with a sufficiency of 3- and 4-bedroom homes likely already within the existing stock.

6 CHP 9: CLIMATE TRANSITION AND OUR ENVIRONMENT

The IGBC welcomes the inclusion of a full chapter on climate transition and our environment but would like to stress that in a climate and biodiversity emergency, **these considerations must infuse all planning policies and decisions and cannot be treated as an add-on**.

The inclusion of objective 67 and the requirement that development "occurs within environmental limits" is extremely positive, but further clarifications on how this will be implemented (including metrics) is needed. The methodology will need to ensure the three environmental crises we are facing (carbon, resources, and biodiversity) are fully addressed. Indicators that should be considered include:

- **Carbon**: Introduce requirements for whole-life carbon measurements and limit values as soon as possible, and by January 2027 at the latest*. This is best addressed at planning stage as it is at the earliest stages that many of the big, most impactful decisions on carbon emissions are made, and can be informed by the Guidelines for planners on the design and building of low carbon, low-rise, medium density housing in Ireland produced as part of the Construct Innovate Viable Homes project.
- **Resources**: The construction industry is responsible for over 50% of all the waste generated nationally (EPA, 2021). Many construction materials are technically reusable, but less than 2% of building elements are currently reused. This represents a significant waste of resources**. Significant opportunities to address this exist at planning stage. More specifically, the IGBC would recommend including circularity statement to show how the proposed development is designed for resource efficiency, adaptability, and disassembly. The GLA Circularity statement may be useful there: Circular Economy Statement Guidance | London City Hall
- **Biodiversity**: This should include Biodiversity Net Gain targets (under objective 85) as required for new development in England and/or targets on soil sealing as already done in France and Germany. E.g., Zero Soil Sealing by 2050. Local authorities could subsequently be required to develop strategies to reduce soil sealing by 2030 and reach zero soil sealing by 2050.
- **Adaptation:** Request a Climate Vulnerability & Risk Assessment (CVRA) for new buildings so they can adapt to future climate hazards. Read more: CDP_Resourcepack.pdf.

*This is aligned with the requirements of the Energy Performance of Buildings Directive (EPBD) – 2024 Recast, but a number of other European member states have already regulated these emissions – e.g., Denmark, France and the Netherlands. Furthermore, a carbon modeling study commissioned by the IGBC to a group of researchers from UCD clearly shows that Ireland cannot reach its 2030 climate targets without addressing these emissions. Read more at: igbc.ie/wp-content/uploads/2022/10/WLC-UCD-IGBC_30.09.22_V4.0_MidRes.pdf.

** Ireland's Circularity Metric is 2.72%—meaning that over 97% of the materials flowing through our economy come from virgin sources This is considerably lower than the Circularity Metric for the global economy, measured at 7.2% in 2023.

The inclusion of objective 68, and the acknowledgment of the need to support the sustainable re-use of existing buildings and structures, and to reduce the rate of land use change from urban sprawl and new development to support the circular economy is highly welcome. However, reaching this objective may be challenging due to the current wording of objective 29, and the lack of ambition of objectives 7, 8, and 9. Furthermore, specific targets supported by high-quality data are needed to reduce the rate of land use change.

p.131, in the paragraph on the "built environment", given Ireland's climate targets and the requirements in the EPBD Recast 2024 to start measuring the global warming potential of buildings across their life cycle by 2027 at the latest, it would make sense to cover more than operational emissions. While significant progress has been made in addressing these emissions – as highlighted in the document, a report commissioned by the IGBC to a group of researchers of UCD shows that embodied carbon emissions currently account for 14% of our national emissions and that we cannot reach our 2030 climate targets without addressing these emissions. Read more at: igbc.ie/wp-content/uploads/2022/10/WLC-UCD-IGBC_30.09.22_V4.0_MidRes.pdf.

The **IGBC welcomes the inclusion of objective 69 but believes that more needs to be done to support the growth and development of efficient district heating and electrification of heating**. More specifically, the rollout of district heating in areas where already promised and where there are available sources of waste or fossil-free heat must be sped up if developers are expected to credibly sign up for connection. Grants currently available for renewables must be reviewed to ensure funding is available for a wider range of renewable. E.g., connections to district heating.

The IGBC fully supports objective 70: "Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions as expressed in the most recently adopted carbon budgets". However, and as previously highlighted, **this should be used to address more than operational emissions associated with the built environment.** More specifically, it **should also support a reduction of transport emissions, and embodied carbon emissions**

associated with the built environment. As it is at the earliest stages that many of the big, most impactful decisions on carbon emissions are made, we believe that a LCA assessment should be required for larger projects as part of the planning process (following the EN15978 standard). This should be complemented by a circularity statement to show how the proposed development is designed for resource efficiency, adaptability, and disassembly. Where large-scale demolition is proposed, we would suggest requesting the following: 1. A rational for the demolition, including an assessment of alternative proposals incorporating the existing buildings. 2. An LCA estimate for the alternative proposals. The comparative analysis should follow the standard EN15978 and the scope should be the same for both proposals – the scope should include all building elements (which will be set to zero for those that already exist). 3. If permission is to be granted then the following mitigation measures should be required: a. A circularity statement should be submitted with the proposal showing how the proposed development is designed for resource efficiency, adaptability, and disassembly. The GLA Circularity statement may be useful there: Circular Economy Statement Guidance | London City Hall, b. If planning is granted a condition should be added that prior to commencement a pre-demolition audit should be submitted to the planning authority. This should cover key products and construction materials that can be reused on/off site, and a list of materials that can be repurposed and remanufactured. The Guidelines for planners on the design and building of low carbon, low rise, medium density housing in Ireland published as part of the Viable Homes project may also be useful. It shows that significant decreases in carbon emissions could be achieved by rethinking the use of carbon-intensive construction materials in our dwellings, and by adopting planning approaches that minimise car-parking, new roads, and infrastructure. For instance, greenfield housing developments outside towns and cities can contribute up to 30% more embodied carbon per home than equivalent infill developments that use existing infrastructure. The guidance document also highlights that connected dwellings such as terraced houses, lead to a consistent reduction in terms of carbon emissions. A side gable wall, which is typically found in semi-detached houses, generates approximately 4-5 times more embodied carbon per square metre than a party wall between dwellings on a terrace.

The IGBC supports National Policy **Objective 77**: "Sustainably manage waste generation including construction and demolition waste, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society". **A key aspect of this policy objective should be to support the reuse of our existing building stock, and to ensure that all new buildings are designed for resource efficiency, adaptability, and disassembly - see previous comment on circularity statement**. **Consequently, ALL policy objectives must prioritise and support re-use of our existing stock**. Completing a full review of the existing stock to evaluate what is available for use and where, and to assess what additional space and building types may be needed, should also be a priority. In addition to investment "in different types of waste treatment", we would **recommend**

investing in a digital catalogue of construction materials ready for re-use, and in storage facilities for these materials across the country[6].

The **IGBC supports objectives 78, 79, and 80 on SUDs and Nature-Based Solutions**. However, the feedback that we have received as part of our Biodiversity and the Built Environment Community of Practice is that **far more work is needed to ensure these become the new norm in Ireland, in particular in relation to awareness raising, skills, and financing mechanisms/funding**. It might be worth looking at the Welsh example as a best practice in making SUDs the new norm. It seems that there is a typo under objective 78 and that under the last bullet point, it should read porous surfacing as opposed to "non-porous surfacing".

The IGBC supports the strong focus on green and blue infrastructure (objectives 81 and 82) but believes that existing and potential wildlife corridors should be better mapped, so that new developments can fully integrate with them. As per previous comments**, some of the terms need to be better defined as it's unclear what "the long-term strategic expansion of urban areas" means**. In a climate and biodiversity crisis, and given urban land expansion in Ireland is among the highest in Europe and characterised by the formation of scattered, remote urban structures, densification and better use of our land should be a priority.

The IGBC supports objectives 84 and 85, and the strong focus on *conservation, enhancement, mitigation and restoration of biodiversity*. However, in a biodiversity crisis, and while habitats fragmentation and destruction are two of the main causes of biodiversity loss, "**seeking to address no net loss of biodiversity" within the planning functions is not sufficient, and planning authorities should seek biodiversity net gain.** Biodiversity Net Gains (BNG) requirements were recently introduced in England, and many large developers are already aiming at this target as this is now encouraged by investors. Introducing BNG requirements will not only protect biodiversity, but it will also ensure a single, comparable methodology is used in Ireland, and biodiversity moves up the agenda and is seen as important as reaching net zero carbon targets.

The IGBC welcomes the inclusion of a full section on the links between a clean environment and a healthy society. This chapter is fully aligned with the definition of a healthy home developed as part of our Healthy Homes Initiative, but we would recommend **incorporating additional considerations such as light pollution and green areas[7].** The **Home Performance Index (HPI) certification system includes several**

[6] This comment is based on the findings of our Construction Materials Exchange Programme (CMeX) pilot project. Read more: 65d3cba5f94c13de2353d17d_240215-Whitepaper-IGBC-CMEx.pdf (website-files.com). As an example, the city of Helsinki provides a storage area for soil that is ready for reuse.

[7] "A healthy home is a user-friendly home, sustainably designed, constructed and maintained to support its occupants' complete physical, mental and social wellbeing. It is well-ventilated, has good indoor environment quality, is free from harmful pollutants, is bright, and facilitates comfortable temperatures. It has adequate sanitation and protects from excessive noise. In addition, a healthy home is well connected to the local community, green space and sustainable transport options." Read more at: 2.-HHI-Report_Final_Digital_20Nov23.pdf (igbc.ie).

indicators that relate to health & wellbeing, and could ensure planning fully support a healthy society. Read more: HPI-Technical-Manual-v3.0.pdf (homeperformanceindex.ie).

While the reference to climate adaptation under objectives 54 and 55 is welcome, we would recommend including a section (and objectives) on it in chapter 9, as impacts of climate change are not limited to coastal areas, sea level change, coastal flooding, and erosion. More specifically, we would recommend developing a built environment sectoral adaptation plan to cover factors affecting new-build. In practical terms, a requirement to submit a "Climate Vulnerability & Risk Assessment" (CVRA) for new buildings so they can adapt to future climate hazards could be incorporated into objective 70. Furthermore, it should be clearer in the draft document that climate adaptation requires action at town and city level to address risk. The "Sponge City" approach taken in Copenhagen is a good example of same.

7 CHAP. 10: IMPLEMENTING THE NATIONAL PLANNING FRAMEWORK

The IGBC welcomes the inclusion of chapter 10 on governance and the focus on improving the links between spatial and transport planning as key to reaching Ireland's climate targets in improving people's quality of life. The IGBC, in partnership with UCD, is currently assessing the transport emissions associated with various types of housing developments as part of the ConstructInnovate funded RE-CUGI project, and will be delighted to share its results in 2025.

The **IGBC welcomes the focus on transport-orientated developments (objectives 93 and 95).** However, **objective 93 needs to be strengthened**. With a growing population, real challenges in tackling our transport emissions, and so many homes to be delivered in the next decade, saying that this approach "*may target a proportion of planned growth in the metropolitan areas"* is insufficient. Ensuring this approach becomes the new norm as soon as possible is critical in addressing our climate emissions, and in improving people's quality of life.

On **zoning (objectives 98 and 99), we are missing an opportunity to address the global warming potential of buildings and infrastructure across their full life cycle**. More specifically, we would recommend **funding a comprehensive study on the impact on whole-life carbon emissions caused by different zoning decisions** (e.g., considering ground conditions, carbon sequestration, infrastructure, and parking requirements).

As **monitoring of progress is critical to a successful implementation of the objectives** of the NPF, we believe that **objective 102 needs to be more specific**. Developing and implementing new approaches to measuring and monitoring compact growth in cities and larger settlements is not specific enough, **e.g., it's unclear when these approaches will be developed, and who will be responsible for monitoring progress**. Furthermore, it's **unclear why this monitoring process would focus exclusively on cities and larger**

settlements. Consistency is key and the IGBC supports recommendation 9 of the Expert Group for the First Revision of the National Planning Framework, i.e., the need to monitor implementation of the NPF annually, and for all relevant Departments and relevant organisations (e.g., Local Authorities) to report publicly on their performance against clear metrics.

Other aspects that should be covered under this chapter include a greater focus on consistency and consistency of enforcement across local authorities to avoid unintended consequences, such as developments happening in counties/areas with the lowest requirements, and a stronger focus on awareness raising and engagement. **Implementing a coherent spatial planning framework requires strong "buy in" of planning authorities, and agencies whose work impacts the locations of enterprises and the delivery of local services, as well as businesses and civil society**. Consequently, the IGBC believes that the following actions are needed:

- Increase in-house expertise in planning authorities and other relevant public bodies through training in carbon literacy, circularity, and ecology. Training programmes should cover these topics and highlight the links between good spatial planning and the common good.
- Run awareness-level training on these aspects for local Councillors.
- **Consider setting up a Citizens' Assembly on housing, planning, and climate and biodiversity actions, to raise awareness about these issues and build a consensus around more contentious policies to address them such as optimisation and re-use**.

Finally, **it's absolutely critical that the right level of funding is provided to planning authorities to ensure they have the resources to fully implement the objectives of the NPF.**