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National Development Plan Review
Department of Public Expenditure, Infrastructure,
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Government Buildings
Upper Merrion Street
Dublin 2

Submitted via online form

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An Taisce Submission on the Consultation on the Review of the National Development Plan 2026-2035

An Taisce welcomes the opportunity to comment on the consultation on the review of the National Development Plan 2026-2035 and wishes to make the following submission.

1. Overarching Comments

The philosophy underpinning the National Development Plan (NDP) is that yet more economic growth is the solution to our country's social, economic, and environmental problems. Yet, as the world's warming climate, extreme weather, plummeting biodiversity, polluted waters, and exhausted soils plainly signal, the logic of continuing economic growth has run up against the material reality of a finite planet – a planet that cannot endlessly provide the resources to fuel growth, nor endlessly absorb the pollution that it produces. The growth logic faces other growing challenges too – the most salient being the fact that the benefits of growth are so unequally shared that over 15,000 people in Ireland are homeless[1] and over 100,000 children in Ireland live in poverty, a number that has almost doubled over the past year.[2] Worldwide, 54% of the total gains from the last four decades of growth have gone to the richest 1%, with 70% of gains going to the richest 5%.[3] These symptoms of profound social and environmental dysfunction indicate that the prevailing growth-focused economic model is no longer working for people or planet.

[1] https://www.irishtimes.com/ireland/social-affairs/2025/01/03/number-of-homeless-people-passes-15000-for-first-time-since-records-began/
[2] https://www.irishexaminer.com/news/arid-41648306.html
[3] https://globalinequality.org/global-income-inequality/

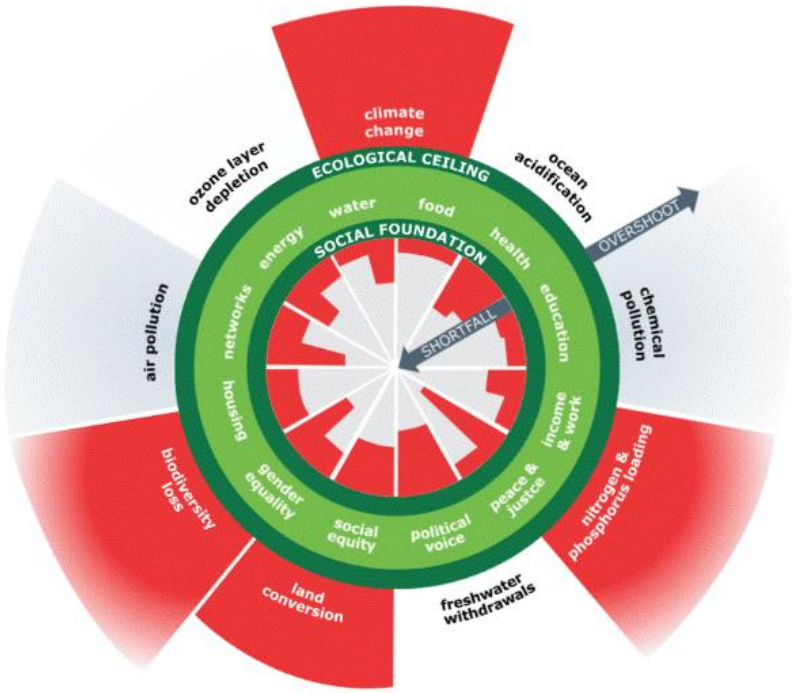
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Adding to these troubles are recent geopolitical events – from the war in Ukraine and escalating genocide and war in the Middle East to President Trump's trade war – that underscore Ireland's economic vulnerability. It is An Taisce's considered view that the 2025 review of the NDP must be a time for Ireland to rethink and redesign its economic model so that it is no longer structurally dependent on growth but instead prioritises the health and wellbeing of people and planet while building resilience to imminent economic and environmental threats. Such a radical rethink demands a genuinely long-term perspective – an NDP that builds a fairer, healthier Ireland that we will be proud to leave to our children and grandchildren, rather than one that focuses solely on short-term growth now.

The NDP should set out the framework for a just and liveable Ireland by adopting an alternative guiding philosophy and model. We recommend that the *Doughnut Economics* model developed by Kate Raworth be used to underpin the NDP. This model (see figure below) requires shifting from a fragile growth-oriented economy toward one that ensures that everyone has the essentials they need for a good life (a "just social foundation" of housing, food, energy, education, health, water, employment, justice and equity) while remaining within our planetary and ecological boundaries. In Ireland, one of the world's richest countries, many people fall below the just social foundation and into the hole at the centre of the Doughnut, while resource use and pollution transgress the safe ecological ceiling, overshooting what our planet can safely provide and absorb. The health and wellbeing of our people, society, and economy is unavoidably dependent on the health and wellbeing of our biosphere and the animal and plant life that shares our planet. The Irish public want and have a right to live in places that provide them with opportunities to live a healthy and good life, individually and collectively, while remaining within the limits of justice, intergenerational equity, and environmental sustainability.



The Doughnut Economics framework as developed by Kate Raworth
– showing the overshoots beyond the ecological ceiling and shortfalls regarding the social foundations of human well-being

1.1 Format of the consultation

We have endeavoured to format our submission in line with the questions posed in the consultation document in so far as is possible. However, we consider the consultation format to be far too restrictive to allow for a substantive public consultation or a meaningful review of the NDP.

The format does not reflect the integrated approach to expenditure needed to support development while addressing the climate and biodiversity emergencies. For instance, An Taisce considers that the approach of ranking investment priorities is not integrated and therefore inappropriate. The consultation asks respondents to rank sectors in order of priority yet wholly fails to acknowledge or interrogate the interconnections between them.

Furthermore, there is a serious lack of information in the consultation document on current and proposed expenditure. It is only discussed briefly in relation to the capital expenditure of the largest-spending Departments from 2019-2025 (Table 1 of the consultation document). This does not provide nearly enough granularity to enable a meaningful evaluation of capital expenditure and the future allocation of the capital budget.

It is acknowledged that this consultation may be primarily intended to inform the detail of the NDP review at an early stage. We therefore strongly recommend that another consultation be conducted when the detailed proposals are drafted to enable the level of public review required.

2. A Carbon Budget-Compliant National Development Plan

Compliance with our legally binding emissions reduction obligations must be the central constraint on the NDP, for reasons of fairness and equity under the Paris Agreement, but also because breaching our legal European commitments will result in costs exceeding €20BN. Delaying action and public expenditure on measures to reduce emissions and thereby risking such significant fines would be a serious fiscal mistake.

Emissions in Ireland are subject to two sets of legal obligations:

- At national level - compliance with carbon budgets and corresponding sectoral emissions ceilings as per the Climate Action and Low Carbon Development Act 2015 (as amended) (hereafter referred to as the Climate Act) and its requirement to reduce national emissions in line with Ireland's fair share of global emissions: the first two budgets are 295Mt for 2021-2025 and 200Mt for 2026-2030 based on a 2018 baseline; and
- At EU level - a 42% reduction in national Emission Sharing Regulation (ESR) emissions by 2030 based on a 2005 baseline.

Focusing on the Climate Act, on-time compliance with all carbon budget tonnages is legally binding**.** In the absence of immediate course adjustment and urgent measures, both the Climate Change Advisory Council (CCAC) and the Environmental Protection Agency (EPA) project a failure to comply with the first budget and most of its sectoral ceilings and indeed with the second budget as well. As per the Climate Act, any overshoot of a carbon budget must be carried forward into the next budget period, thereby reducing the subsequent budget.

The EPA's latest emissions report,[4] published in May 2025, projects that Carbon Budget 1 for 2021-2025 (set at 295 Mt CO2eq) will be exceeded by 8-12 Mt CO2eq. Therefore, Carbon Budget 2 for the 2026-2030 period will have to be reduced by the amount of any overshoot that occurs in Carbon Budget 1. The EPA report projects that Carbon Budget 2 will be exceeded by 77-114 Mt CO2eq (with carryover from Budget 1).

Ultimately, the reality of climate change and the need to ensure our fair share contribution to emissions reduction per the Paris Agreement and our own Climate Act mean that all of our development must now take place within the constraints of our emissions reduction requirements. To comply with the constraints of the legally binding carbon budgets, carbon emissions associated with activities of a particular sector must add up to a figure within the relevant sectoral ceiling. Given the currently projected exceedances for Carbon Budgets 1 and 2 and their sectoral ceilings, budget and sectoral ceiling compliance must mean cutting back on current projected activities as well as not adding further new activities.

This will require a serious rethink of how we as a society prioritise our activities and development. This, of course, has profound implications for the NDP.

This context on Ireland's emission reduction legal obligations is critical in demonstrating the serious problem we current face in complying with the legally binding carbon budgets. It therefore also highlights the urgency with which all of society must act to keep Ireland in line with its commitments to a fair share contribution to global emissions reduction, especially those bodies with obligations under the Climate Act, of which the Department of Public Expenditure, Infrastructure, Public Service Reform, and Digitalisation is one.

An Taisce submits that a detailed reconciliation of current and proposed NDP-related expenditure against the requirements of the carbon budgets and sectoral ceilings is therefore required as a matter of urgency. To An Taisce's knowledge, there has been a failure to do this thus far.

Section 15(1) of the Climate Action and Low Carbon Development Act 2015 (as amended) places obligations on relevant bodies, including the Department of Public Expenditure:

> "*A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—*
> *(a) the most recent approved climate action plan,*
> *(b) the most recent approved national long term climate action strategy,*
> *(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*
> *(d) the furtherance of the national climate objective, and*
> *(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State."*

We would also highlight s.6(B)(13) of the Climate Act, which stipulates that:

> *"A Minister of the Government shall, in so far as practicable, perform his or her functions in a manner consistent with a carbon budget that has effect under subsection (7) or (11), as the case may be"* (meaning the carbon budgets applying to any given budget period).

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[4] EPA (2025) Ireland's Greenhouse Gas Emissions Projections 2024-2055: https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-Report-2024-2055-May25.pdf

An Taisce recommends that information be published alongside the NDP review on how the NDP and the review itself have met section 15 and other Climate Act requirements.

3. Sectoral Comments

An Taisce considers the ranking of a top three expenditure priorities to be an oversimplified approach and one that is premature until it has been demonstrated that the overall capital budget is assessed against Ireland's carbon budget obligations. We make sector-specific comments below (in no particular order) and then discuss prioritisation.

3.1 Housing

We highlight the critical need for greater capital investment from the national government towards local authority initiatives seeking to implement the ambitious targets of the Climate Action Plan (CAP) and Biodiversity Action Plan. For example, with regard to the built environment, we note the ambitious target in Climate Action Plan 2024 to install 1 GW of new non-utility solar which is a KPI for 2025, and 2.5 GW by 2030. This represents a huge opportunity to install domestic solar arrays across older and new social housing stock to meet our rapid decarbonisation needs, tackle energy poverty, and improve quality of life for lower-income households. However, local authority housing capital units seem to struggle with capital costs associated with installing such infrastructure, as well as meeting targets for local authority social housing retrofitting, which is widening the implementation gap in this respect. Consequently, the NDP requires greater ringfenced funding for local authorities to implement CAP and its KPIs.

We also highlight statistics from the Irish Building Stock Observatory (IBSO) on the current status of BER ratings, retrofit status of the Irish dwelling stock and heat generation, which demonstrates the volume of work to be done to meet our climate obligations and the need for the NDP to be designed in way which reflects that.

For Q2 of 2025, IBSO outlines how over 580,000 properties in the Irish building stock out of 875,813 can still be characterised by a BER rating of C or lower.[5] This exemplifies the scale of the challenge to bring the housing stock up to modern standards for climate and living standards. NDP capital allocation urgently requires a reflection of the scale of this body of work.

With regard to the retrofit status of the Irish dwelling stock, IBSO highlights that 78% of the current dwelling stock still requires retrofit which is indicative of the lack of meaningful national government capital expenditure allocation for these purposes.[6] The next instalment of the NDP urgently needs to tackle this problem and invest in the retrofitting regime.

This "Requiring Retrofit" number has risen consistently since Q4 of 2023 when the number was 653,632, demonstrating a rising number of properties not meeting urgent BER and retrofitting standards. We note the CAP commitment to 500,000 homes retrofitted by 2030. The upcoming NDP is absolutely critical to the attainment of this, if the government is serious about their climate obligations and their commitment to tackling energy poverty and securing climate justice and a just transition.

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[5] https://www.ibso.ie/allber.php
[6] https://www.ibso.ie/retrofit.php

Furthermore, it would appear that the State is falling behind on its CAP commitments to install 680,000 heat pumps in both new and existing housing by 2030, which was estimated to cost €9 billion. The NDP needs to ensure ringfenced funding for the realisation of this crucial measure, and to also ensure backup funding in case heat pump installation goes above projected costs which seems to be a regular occurrence. Currently, only 108,519 heat pumps are currently installed, or 12% of total properties,[7] which emphasises the need for the NDP to set aside funding to meet the ambitious 2030 goals. This will also ensure that the phaseout of oil and gas boilers continues in earnest.

A strategy for green procurement of construction materials in the built environment is urgently required to ensure that low-carbon materials are being sourced rather than carbon intensive and plastic materials. Failure to meaningfully engage with this issue in the NDP risks perpetuating a carbon intensive built environment sector in Ireland in terms of embodied emissions in construction materials and operational phase energy usage. As outlined in a report by the Irish Green Building Council, construction and operation of the Irish built environment accounts for approximately 23MtCO2e of annual emissions in a standard year which accounts for 37% of national emissions due to building operations and embodied carbon.[8] Furthermore, CAP seeks to decrease embodied carbon for materials produced and used in Ireland by at least 30%.

From an embodied carbon perspective, the NPF recognises that adaptive reuse of vacant and derelict building stock is beneficial for this purpose. Hence, greater funding for local authorities to utilise their powers under the Derelict Sites Act 1990 for acquisition of properties, refurbishment and reuse would be important for decarbonisation of the built environment, as well as other co-benefits such as urban regeneration and increased vitality. Current schemes seeking to tackle vacancy and dereliction do not seem fit for purpose given the shocking figures from the CSO's 2022 census in which there were 130,469 vacant houses and 32,964 vacant flats/apartments. This signifies an opportunity to revitalise our urban centres while reducing some need for new carbon-intensive building stock and preserving built heritage.

3.2 Transport

As noted earlier, we need a carbon budget-compliant NDP. Applying this logic to the transport sector, and referring to our sectoral emissions ceilings for transport, it is essential that investments in the transport domain over the course of the new NDP period bring the Irish economy and society on a rapidly decarbonising trajectory. This means that transport capital investments need to lock Irish society into a low carbon direction, rather than – as has been the broad trend for the last few decades – into a set of travel patterns and dependencies where emissions from transport are on a near continual upward trajectory.

An Taisce strongly endorses state investments in active travel and public transport infrastructures (and supporting policies). The vast bulk of transport capital infrastructure investment (80%+) needs to be allocated to these domains. More specifically, we strongly support investment along the following lines:

[7] https://www.ibso.ie/heatgeneration.php
[8] O'Hegarty et al. 2022. Whole Life Carbon in Construction and in the Built Environment in Ireland. https://www.igbc.ie/resources/whole-life-carbon-in-construction-and-in-the-built-environment-in-ireland-v4

Investments in Public Transport: Delivering the Backbone of Modal Shift

The NDP must deliver a transformational shift away from car dependency, particularly in urban areas where the potential for modal shift is greatest. This requires significant and sustained capital investment in large-scale public transport infrastructure, paired with the completion of high-quality active travel networks. We strongly support accelerated investment in:

- **MetroLink –** This project will provide a North-South running high-quality/high-capacity spine for public transport in the Greater Dublin Area (GDA), and will integrate with DART, Luas, sub-urban rail and BusConnects services, as well as intersecting with Dublin's evolving GDA Cycle Network Plan. It is essential, as this project moves to the enforceable Railway Order stage, that the government provides strong leadership on it as expressed in appropriate multi-annual allocations in the NDP.
- **DART+ –** This essential upgrade to our suburban rail system will allow for much higher frequency movements and hence much higher passenger capacities on key rail corridors.
- **BusConnects** in all cities, particularly Dublin, Cork, Galway, Limerick and Waterford. The reallocation and more efficient use of road space will help to deliver reliable, accessible and inclusive public transport services.
- **LUAS Networks in our major Cities.** An Taisce strongly supports the rapid advancement of Luas Finglas (soon to move to the enforceable railway order stage, we hope), Luas Cork, Luas Lucan – plus the provision of funding to expand and introduce Luas lines/networks in Dublin, Cork and Galway. The future of Irish cities should rest on the provision of extensive and continually growing tram networks, which themselves can support transit-oriented housing developments and cleaner, quieter and move liveable cities.
- Expanded **interurban and regional rail services**, enabling car-free inter-city travel and town-to-city commuting. The All-Island Strategic Rail Review must become the framework for the next couple of decades of development for transport infrastructure in Ireland, with funding envelopes provided to support this.

These projects must be prioritised not only for their transport benefits but for their role in achieving Ireland's climate, housing, and air quality targets. Crucially, they must be designed from the outset to integrate walking and cycling as first- and last-mile solutions.

Multi-Annual Funding of a Minimum €500m/annum for Active Travel

The €360m annual allocation (under the 2020 Programme for Government) is no longer sufficient due to construction inflation and increased delivery costs. These inflation issues have been identified as a major barrier to completing the intended pipeline of projects from the NTA and TII. A revised commitment of minimum €500 million per year, indexed for inflation, should be hardwired into the NDP, and ring-fenced for:

- The five metropolitan strategic cycle networks (i.e. Greater Dublin Area, Waterford, Cork, Limerick and Galway). The aim should be for these to be completed by 2030;
- National Cycle Network (NCN) and CycleConnects cycle schemes;
- Rural cycling infrastructure (including 'Rothar Roads' and Greenways);
- Safe Routes to School and urban permeability; and

- Bike parking, hubs, and intermodal connectivity. To include a state-of-the-art demonstration project of a super high quality / high capacity (multi-story) bicycle park at a transport interchange (similar those of Utrecht, Groningen or Malmo[9]).

A stop-start cycle of annual budget battles undermines delivery certainty. Multi-annual investment planning must become standard practice to enable workforce retention, land acquisition, public engagement, and design continuity.

Strengthening of Delivery Systems for Active Travel Projects

An Taisce calls for:

- Expanded capacity in Local Authority Active Travel Teams, including upskilling pathways and retention supports.
- Increased staffing within the National Transport Authority and the Department of Transport to lead on continually improving design guidance (while drawing on analyses of the success and weaknesses of the design of schemes already implemented), interagency coordination, and oversight.
- Simplified procurement and planning pathways for shovel-ready active travel projects.
- Integration of active travel/cycle infrastructure audits in all major transport investment appraisals, and major housing and planning developments.

The NDP must explicitly recognise the need to invest not just in hard infrastructure, but in competence.

Reducing Road Traffic Danger, Emissions and Noise on the Roads Network

One of the key findings of the 2022 OECD Report "Redesigning Ireland's Transport for Net Zero: Towards Systems that Work for People and the Planet"[10] was that:

> *"The Irish transport system fosters growing car use and emissions by design and is thus unfit to enable the country to meet its greenhouse gas reduction goals while improving well-being. Growing car use in Ireland is largely determined by car-dependent transport and urban systems, organised around increased mobility and characterised by three unsustainable dynamics: induced car demand, urban sprawl, and the sustainable modes low-attractiveness trap."*

Therefore, any proposed investment in new national roads infrastructure must be analysed through the prism of the "induced-demand effect" for vehicle travel, that is whereby increases in highway capacity attract new traffic.[11]

What follows on here is that the priority focus of investments in our national roads network must be in:

- the reallocation of road space and the reconfiguration of junctions for bus priority measures, particularly in the vicinity of congested stretches of national roads on the

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[9] https://bicycledutch.wordpress.com/2024/08/21/happy-anniversary-to-the-worlds-largest-bicycle-parking-garage/

[10] https://www.oecd.org/content/dam/oecd/en/publications/reports/2022/10/redesigning-ireland-s-transport-for-net-zero_e4149b08/b798a4c1-en.pdf)

[11] See for example 'Induced demand and rebound effects in road transport' - https://www.sciencedirect.com/science/article/abs/pii/S0191261510000226)

approaches to our cities and ensuring there are safe parallel routes for active travel users (e.g. with greenways or cycleways or high-quality segregated facilities).
- reducing the severance effects of national roads by providing dedicated active travel and public transport only bridges / underpasses / direct routes so as to reduce travel times for the more sustainable modes (e.g. across the M50);
- reducing speed limits on stretches of road with higher road traffic collision frequencies, and on those roads with schools located alongside them.

We stress here that road safety is also a capital investment issue - the NDP must fund the technological and enforcement infrastructure needed to protect vulnerable road users including: the deployment of average speed cameras (increase from 5 to 30 by end of 2026), Urban enforcement of red light running and illegal parking in cycle/bus lanes, and Integration of active travel and safe overtaking distance messaging into RSA campaigns.

Facilitating a modal shift will also address road traffic noise issues, which a recent report from the European Environment Agency highlights as impacting 1 million people in Ireland.[12]

Enabling higher quality Sail-and-Rail links to Britain and the Continent

Travel to the UK and the Continent via lower carbon sail-and-rail links needs to be facilitated and prioritised in the NDP. This can be done by ensuring there are high quality, high frequency, convenient and safe public transport and active travel links to and from each of our ports (and particularly Dublin Port, Rosslare Europort and Cork/Ringaskiddy). Additionally, the NDP should support greater investment in the research and development of low-carbon high speed passenger ferries between Ireland and Britain as well as between Ireland and the Continent.

The NDP should support a move away from aviation in line with our emissions reduction obligations and targets. Investments in the expansion and provision of additional capacities of our airports are not compatible with our need to very rapidly reduce emissions across all sectors.

3.3 Energy

In light of the serious challenges we face in complying with our carbon budgets and other emissions reduction obligations, as discussed in section 2 of this submission, the NDP must prioritise investment in rapidly moving away from fossil fuel infrastructure and rolling out renewable energy. Any funding for renewables development should support projects that:

- Are fully compliant with our national, European and international legal obligations;
- Recognise the intertwined nature of the climate and biodiversity crises by avoiding particularly ecologically sensitive areas and fully assess and mitigate potential ecological impacts.

Any further investment in fossil fuel infrastructure not only further exacerbates the likely overshoots of our carbon budgets but also runs the very serious risk that such infrastructure will become stranded assets as the energy transition progresses. This would therefore represent a misuse of public funds. We also highlight that there is no case to be made for the development of liquid natural gas (LNG) infrastructure, such as terminals and power plants.

[12] https://www.irishtimes.com/health/2025/06/24/more-than-1m-irish-people-exposed-to-harmful-transport-noise-report-finds/

To support renewables development, significant investment in expanding and improving the electricity grid will be essential.

In addition to rapid build out of renewable energy and supportive grid infrastructure, the NDP should invest in battery storage as an alternative to fossil fuels, to address dunkelflaute (periods of low wind and little sunlight). Funding should be allocated for further research and development of innovations in battery technology,[13] which could offer affordable, scalable, resource un-intensive, and environmentally sustainable storage solutions. Should these prove effective and scalable, these should be prioritised.

The NDP should also considerably expand government support for Community Energy projects through expansion and promotion of the Small-Scale Renewable Electricity Support Scheme (SRESS) and by identifying and addressing obstacles to community energy, including challenges and costs related to grid connections and infrastructure.

3.4 Water

Almost half of Ireland's rivers and lakes are currently of unsatisfactory ecological status under the EU Water Framework Directive (WFD), and two thirds of our estuaries[14]. The three-year average concentrations for nitrate in rivers show that 42% of river sites nationally have unsatisfactory nitrate concentrations (above 8 mg/l NO3)[15], and many of these occur in the south and south-east of Ireland, with agriculture being the biggest driver of that trend. Agriculture is the biggest overall pressure on water quality, followed by hydromorphology, forestry and then urban wastewater.

The management of surface and ground water in accordance with the provisions of the Water Framework Directive and Groundwater Directive will be one of the most crucial challenges in the coming years. Ireland faces a serious uphill battle in achieving 'good' status in all water bodies by 2027 as required by the WFD.

There is a credible and significant risk that Ireland will not be granted an additional nitrates derogation from the European Commission, or that what is granted is a significant modification of what the agriculture sector is used to operating under. This could occur on foot of a decision by the European Commission, due to inadequate water quality, particularly nitrate pollution in the south and southeast of Ireland. It may also result from the legal challenge which An Taisce has taken on foot of Ireland Nitrates Action Programme, one focus of which is the legality of the current nitrates derogation. Should that occur, it is essential that the farmers impacted have a managed transition to lower stocking densities, or an alternative farming model. It is critical that a contingency plan be developed in case Ireland has a much reduced, or no derogation, in order to assist the impacted farmers. Funding should be allocated to cover such a contingency, given the credible risk, and a plan should be put in place and communicated to relevant stakeholders in the sector.

Urban wastewater continues to be a pressure on 208 waterbodies, and it is imperative that the Uisce Eireann investment plan be properly resourced, with additional state funding allocated where necessary, to halt sewage pollution of these 208 waters, or at a minimum the

[13] Such as recent work on iron-air batteries: https://www.technologyreview.com/2024/10/01/1104382/2024-climate-tech-companies-form-energy-iron-batteries/
[14] water-action-plan-2024.pdf
[15] EPA-Water-Quality-Indicator-Report-2023-web-11June2024.pdf

top 42 priority areas where improvements are most urgently needed. The development of wastewater infrastructure is also critical for housing development.

Drinking water infrastructure must also be adequately resourced and developed, particularly given the over-reliance on single sources of supply are putting drinking water supplies at risk. For example, the River Liffey supplies 85% of the drinking water for the greater Dublin area, which amounts to 40% of its flow. The demand for water in the Greater Dublin Area has now increased beyond sustainable supply levels, by the equivalent of 120,000 households, putting significant pressure on the system.

3.5 Agriculture

The risks to the intensive agriculture sector are ever more apparent on foot of climate change, biodiversity loss and perturbations to global trade. The world's food and agricultural systems feed more people than ever before, supplying large volumes of key commodities to domestic and international markets. Yet, the intensification of agricultural practices across the world is causing potentially irreversible damage to the planet's living systems – its soils, air, biodiversity and water. Exceeding planetary limits threatens to weaken the very support systems that are crucial to food production and ecosystem health. We recommend that the Government develop and fund a farmer and community-centred Just Transition action plan for the sector that includes diversification options with environmental co-benefits. We recommend funding support for the scaling up of local and indigenous nature-friendly food production, especially in cereals and pulses for human consumption, fruit and vegetables – a large proportion of which are currently imported at the expense of the indigenous tillage and horticultural sector.

3.6 Enterprise

The Government includes the further development of data centres as a key part of its enterprise strategy. However, we would highlight that the proliferation of data centres has largely gone unchecked in Ireland, as has their power consumption, which increased 400% between 2015 and 2022, by 31% between 2021 and 2022 alone and 20% between 2022 and 2023. As of 2023 data centres consumed 21% of Ireland's total metred electricity.[16] This is up from 5% in 2015 and 18% in 2022, and it represents more electricity use than all urban households in Ireland combined.

While the use of data is undoubtedly a crucial part of modern life, like everything, it must be done within our planetary boundaries and our legally binding emissions reduction obligations. The decarbonisation of Ireland's electricity supply is being undermined by the energy-intensive trajectory of data centre development.

Indeed, progress towards carbon budget compliance and the displacement of existing high emissions energy sources with renewables has been significantly diluted by the ongoing proliferation of high energy demand developments, data centres particularly.[17] The higher the total electricity demand, the more renewable capacity is needed to ensure decarbonisation of the energy sector. Therefore, the more energy intensive developments, like data centres, that come onstream, the more difficult it will be to reach that goal and address our existing emissions mitigation needs in line with the carbon budgets. Critically, the only thing the climate

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[16] https://www.cso.ie/en/releasesandpublications/ep/p-dcmec/datacentresmeteredelectricityconsumption2023/keyfindings/

[17] Daly, H. (2024) Data centres in the context of Ireland's carbon budgets. University College Cork. https://www.friendsoftheearth.ie/assets/files/pdf/data_centrres_and_the_carbon_budgets_-_prof_hannah_daly_dec_2024.pdf

will actually respond to is a reduction in cumulative emissions. So, despite an increase in overall renewable energy capacity, unless that capacity keeps pace with or exceeds demand, we are not making significant progress towards achieving the decarbonisation of energy and actually reducing emissions.

In fact SEAI figures show that the share of renewables has not increased since 2020, largely due to the impact of data centres.[18] They state in their 2024 National Energy Projections report: "*If the scale and pace of renewable energy growth cannot exceed that of electricity demand, as was the case in 2023, then renewables are just abating further increases in emissions rather than delivering the absolute reductions in greenhouse gas emissions required.*"[19] Similarly, research from Dr. Hannah Daly in University College Cork found that since 2017 the increase in data centre power demand has outstripped all the additional electricity generated from wind power in Ireland.[20]

Data centre development and data centre electricity demand must therefore be considered within a carbon budget-constrained framework and within the physical constraints that exist, such as the inadequate state of the national electricity grid and the amount of land available for the generation of renewable power in Ireland. It must be weighed up against more critical societal needs such as electricity for heating and transport. It is vital, in any consideration of the further expansion of data centres and allocation of the capital budget to support such further growth, that the real cost in terms of energy use, land use and emissions must be weighed against any economic benefits to Ireland.

3.7 Sectoral Prioritisation

The consultation document asks respondents to prioritise three sectors for additional investment in the context of ensuring "*that economic infrastructure can be prioritised to deliver 300,000 additional homes by 2030 and to support international competitiveness*". As states above, An Taisce considers this approach to be a serious oversimplification. It also ignores the interconnections between the various sectors as well as the need for all investment to take place within our planetary boundaries in light of the climate and biodiversity crises.

To attempt answer the consultation question, however, we consider that, out of the list provided, transport, energy, and water should be priorities for significant additional investment. In the first instance, these are all crucial for the delivery of housing and the ambitious compact settlement objectives of the National Planning Framework. These three areas are also critical in achieving compliance with our legally binding carbon budgets and with multiple other environmental law obligations.

4. Consideration of Constraints and Trade-Offs

4.1 Climate and Biodiversity

The consultation document does not at any point address the twin climate and biodiversity loss crises, even though these crises both profoundly impact and are profoundly impacted by

[18] https://www.businesspost.ie/politics/irelands-renewable-energy-still-at-2020-levels-says-seai/
[19] SEAI (2024) National Energy Projections 2024: https://www.seai.ie/sites/default/files/publications/National-Energy-Projections-Report-2024.pdf
[20] Daly, H. (2024) Data centres in the context of Ireland's carbon budgets. University College Cork. https://www.friendsoftheearth.ie/assets/files/pdf/data_centrres_and_the_carbon_budgets_-_prof_hannah_daly_dec_2024.pdf

development. Addressing them will require very significant action and investment across all sectors, so it is of great concern to An Taisce that are not discussed in the document. Addressing the climate and biodiversity crises should underpin the capital expenditure strategies across all sectors and be integrated throughout. They are also often presented negatively simply as constraints on development, but fully integrating emissions reduction and biodiversity enhancement measures into the NDP and Project Ireland 2040 more broadly would have a range of significant co-benefits.

For example, successful integration of climate and biodiversity together in the NDP would allow such things as the benefits of peatland and wetland restoration for both flood alleviation and carbon sequestration to be realised, in addition to the biodiversity and water quality benefits. If a certain percentage of funds earmarked for the arterial drainage works and capital flood relief schemes was invested instead in habitat restoration, including peatland restoration, and wetland conservation and creation, then multiple benefits could be realised. These types of synergies and co-benefits are being lost due to lack of integration.

Section 2 of this submission addresses the issue of climate and the need for the NDP to be reconciled against our legally binding carbon budgets. Below are various biodiversity-specific recommendations.

A 2024 report commissioned by the Irish Environmental Network (IEN)[21] and prepared by Natural Capital Ireland (NCI) underscores the critical need for sustained and effective funding for nature restoration, particularly in light of Ireland's commitments under the EU Nature Restoration Law and the 4th National Biodiversity Action Plan (NBAP) 2023–2030. The report highlights that meeting Ireland's legal and ecological commitments will require a transformative shift in how nature is funded, and that without sustained funding, cross-sector collaboration, and strong partnerships with local communities, the targets set by the Nature Restoration Law will remain out of reach.

Work by UCD highlights that to meet existing ongoing environmental obligations, Ireland must boost annual investment in key ecosystems—peatlands, freshwater, forests, coasts, and marine areas and farming. According to the NPWS Financial Needs Assessments[22] the additional resources that will be required under the EU Nature Restoration Law which will bring the total spending on nature restoration to €453.5m-€463.5m. This will require a significant increase in funding to meet our legal obligations and to adequately protect Ireland's nature.

We also highlight the following actions in the National Biodiversity Action Plan 2023-2030 that are relevant to capital expenditure as well as the governance of the NDP and capital expenditure programme:

- Action 1B1: *"NPWS [National Parks and Wildlife Service] will seek multiannual funding for investment in biodiversity"*
- Action 1B4: *"DPENDR [Department of Public Expenditure] will develop and implement systems to track and report expenditure allocations on measures aimed at improving biodiversity."*
- Action 1B5: *"DPENDR will develop and implement systems to track and report expenditure allocations on measures that may adversely affect biodiversity."*

[21] https://ien.ie/funding-nature-restoration-in-ireland-report/
[22] Funding Ireland's Biodiversity: A Financial Needs Assessment for Biodiversity in Ireland (updated 2024)

- Action 1B10: *"Relevant Departments and Agencies will implement long term measures to support biodiversity conservation and restoration through the Infrastructure, Climate and Nature Fund."*

4.2 Resourcing the Planning System

The consultation document presents "*Planning delays and planning refusals for some key projects*", and "*Judicial Reviews of successful planning decisions and local opposition to proposed developments*" as major challenges to the delivery of projects in critical sectors.

In the first instance, it must be highlighted that judicial review is a legal process to test the substantive and procedural legality of a planning decision. It is **not** another chance to appeal or review the planning merits of an application. The courts do not make planning decisions.

Judicial review has been denounced by many as being a primary impediment to delivering housing and infrastructure. While the number of planning decisions that end up in court is very low compared to the total number of planning decisions made annually, we would note that the Office of the Planning Regulator reported in 2022 that the number of successful judicial reviews (therefore the number of planning decisions made unlawfully) has increased exponentially since 2019.[23] This indicates that unlawful planning decisions are indeed a serious issue and that the judicial review system is actually doing what it was designed to do, in terms of correcting those flawed decisions.

Therefore, one of the keys to ensuring the planning system runs smoothly and rapidly to support the delivery of critical projects is ensuring robust, lawful decision making so that planning decisions do not need to end up in the courts in the first instance. This requires significant investment in resourcing our planning authorities so that they have access to all of the expertise needed to make high-quality decisions in the complex and ever-changing world of planning and environmental law. Investing in the resourcing of our planning authorities will also help avoid case backlogs and the associated delays.

Regarding local opposition to developments, genuinely participatory engagement from the earliest stages of project development is needed. Simply telling communities what is planned, followed in some cases by a period of consultation (but generally not consultations that lead to significant changes to projects), is not an effective strategy for garnering public support for large projects. The more the public feels that they have been cut out of the process, the higher the likelihood of opposition.

Facilitating community energy schemes, for example, where communities directly benefit, would also likely increase local support for large-scale energy projects.

4.3 Importance of Targeted Regional Development

Natural resources such as water are increasingly under pressure in the Dublin and Eastern regions. The State is currently planning for additional water resources to be imported from the lower Shannon merely to sustain the growth in demand in this area (estimated cost €6 billion).

Infrastructural resources for wastewater treatment are inadequate to cope with existing needs at times of high demand and are now resulting in contamination of coastal area by sewage

[23] https://www.opr.ie/wp-content/uploads/2022/10/OPR-Review-Report-Phase-1-of-ABP-Review-1.pdf

overflow after periods of intense rainfall (which are projected to increase under the climate change scenarios). Major infrastructural investments are currently needed.

The energy grid is incapable of meeting demand, especially for data centre developments, 108 of which currently exist in the Greater Dublin Area (GDA). EirGrid, for example, has been forced to restrict data centre development in the Dublin area due to the extreme pressures being placed on the grid. Data centres are expected to account for 30% of electricity generation over the next decade. This conflicts with government objectives to electrify transport and residential heating.

The cost of traffic congestion in the GDA was estimated to be €336 million in 2022, and is projected to increase to €1.5 billion by 2040, according to the Oireachtas. This represents a significant four-fold increase in the economic cost of congestion within the GDA over the coming decades.

All of this points to a need to divert development strategy and the associated expenditure away from the over-developed Dublin and Eastern regions. To do so would ease pressure on natural resources, energy and transport infrastructure. It would also reduce commuting times, improve quality of life and well-being for its inhabitants and enable climate and biodiversity objectives to be more easily achieved.

5. Communication of the NDP

An Taisce considers that key to effective communication around the NDP is a shift to active public engagement and the use of participatory models and structures. The current model of State communications around the NDP, and indeed Project Ireland 2040 more broadly, is information-led and top down rather than one that seeds active participation from the ground up. The NDP would benefit from a public engagement framework which goes beyond public consultation stages and has a permanent, on-going and deliberative practice and uses a public advisory panel, similar to the citizens' assemblies. The current model whereby information (often very limited, as is the case in this consultation) is provided to the public and then a period of written consultation opened sets up a largely tokenistic and adversarial model rather than a participatory one where people across society have an on-going ability to access information, engage with it, and actively shape and feed back into it over time. Moving towards an actually participatory approach would much better realise the rights of the public under the Aarhus Convention to not just access information but have the means to use it effectively and access justice when necessary.

We also request that the Department publish detailed information on how the feedback given via this consultation has been taken into account as the NDP review progresses.