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EPAC Reference No-1625

Re: Public Consultation on the draft Transport Climate Change

Sectoral Adaptation Plan II (T-SAP II)

Dear Sir/Madam,

The Environmental Protection Agency (EPA) welcomes the opportunity to respond to this consultation on the draft Transport Climate Change Sectoral Adaptation Plan II (T-SAP II).

The development and implementation of robust sectoral climate adaptation plans is critical to national resilience. These plans are particularly important in the context of a changing climate, where the frequency, intensity, and unpredictability of extreme weather events are also increasing, as highlighted in Ireland's National Climate Change Risk Assessment (NCCRA). While the EPA fully recognises that the NCCRA was published after work on the T-SAPII commenced, we note that the associated [Technical Guidance for Sectoral Risk Assessments](#) was published by EPA in October 2024. We recommend that, where possible, the recently published NCCRA and associated guidance should be used to inform the final plan. The scenarios RCP4.5 and RCP8.5 were used in the NCCRA and the EPA recommends that RCP4.5 be used as the minimum reference scenario for resilience planning in the delivery of this plan and in the formulation of future plans and guidance.

Overall, the T-SAPII demonstrates good alignment with the National Adaptation Framework and the Sectoral Planning Guidelines for Climate Change Adaptation 2024, involving a thorough and well-integrated process and strong stakeholder input that the EPA was involved in at the planning team stage. In the context of increasing climate risks, it is important that adaptation be embedded across all levels of transport policy, capital investment frameworks, and procurement processes. We recommend that climate resilience be a core criterion in project appraisal and funding decisions, particularly for long-lived infrastructure. We welcome that indicators for the evaluation phase have been included in the plan and a structured approach is taken within the sector with quarterly reporting and inclusion of indicators as metrics within annual reporting.

Key EPA Recommendations

The EPA recognises many positive aspects of the plan, however, we have identified five areas that we recommend should be strengthened before the plan is finalised. These are:

1. RCP4.5 should be used as the minimum reference scenario for resilience planning in the delivery of this plan and in the formulation of future plans and guidance. Furthermore, the national alignment table for sea level rise and fluvial flooding from the NCCRA Methodology report should be used in the plan;
2. Building in an interim review in 2028 to ensure additional material and actions are considered for 2028-2030;
3. More comprehensively addressing the three National Adaptation Framework principles of just resilience, nature-based solutions, and maladaptation within the plan;
4. Elaborating on the cascading and cross-sectoral impacts as laid out in the NCCRA; and,
5. Clear links should be made between stakeholder adaptation actions and resilience outcome indicators in the plan.

These points are further developed below.

1. Alignment with NCCRA sea level rise and fluvial flooding table

Contrary to the [Technical Guidance for Sectoral Risk Assessments](#), the plan does not use the national alignment tables from the [NCCRA methodology](#) (Tables A.0.6 to A.0.11). The plan uses lower sea level rise figures, meaning that RCP4.5 is not being used as a reference scenario. This has the potential to lead to misalignment between sectors and consequent gaps in national resilience. Similarly, the plan does not clearly define the fluvial projections being used, which do not seem to be in line with the NCCRA alignment tables. The EPA recommends that the Department reconsider same and revise the draft plan to take account of relevant sea level rise and fluvial projections, to enable a more standardised approach nationally to adaptation across all sectoral plans.

2. Interim Review

The plan covers the five-year period from 2025 to 2030. The EPA notes that, of the 39 actions proposed, most are due to be completed in 2026 and 2027. Considering that the capacity of the sector will have increased over the course of the plan period, there may be scope for further actions to be progressed in 2028-2030. The EPA recommends that the Department should consider including within the plan an interim review in 2028 to examine further actions that could be progressed in 2028-2030.

3. Further Consideration of National Adaptation Framework Principles

The EPA recommends a more in-depth consideration in the plan of the Key National Adaptation Framework principles as per the Sectoral Adaptation Planning Guidelines. Just resilience, nature-based

solutions, and avoiding maladaptation are mentioned in the plan and in the actions but should be addressed more systematically, and in more detail. For example:

Just Resilience

There is one action relating to just resilience (*CS10 Research the integration of Just Resilience consideration into transport planning*) in the plan. Just resilience and vulnerability should ideally have been taken into account as part of the risk assessment process. In implementing the plan, action CS10 should be progressed in an integrated way with other sectors, to ensure just resilience is being considered consistently across sectors with no gaps. For example, there is potential for transport disruption to disproportionately impact on populations that rely on public transport for accessing employment and healthcare, and the EPA recommends that the Department engages with the relevant sectors on incorporating these considerations into transport adaptation planning.

Nature-Based Solutions

The transport sector's exposure to climate hazards – particularly flooding, coastal erosion, and extreme heat – necessitates a proactive approach to climate-proofing critical infrastructure. We recommend greater inclusion of nature-based solutions (NbS) and green infrastructure in adaptation measures, where feasible, to enhance resilience and co-benefits for biodiversity and water quality. Currently in the draft plan, only two subsectors have nature-based solutions actions, both of which are due in 2027:

- I. heavy rail: *HR2 Explore the feasibility of NbS for heavy rail*
- II. buses: *B2 Explore the effectiveness of NbS for bus infrastructure*

Further consideration should be given to including nature-based solutions for other sub-sectors in the plan, or alternatively an overarching action for all sub-sectors of transport to incorporate nature-based solutions where appropriate. Within the lifetime of the plan, the implementation of nature-based solutions should move from exploratory to concrete implementation through design manuals or technical specifications, taking international best practice into account. The EPA recommends that the plan should set out how this can be progressed during the lifetime of the plan with the transport project implementing bodies.

Maladaptation

The consideration of maladaptation in the draft plan is limited to aspects where Transport or other sectors' climate mitigation efforts may harm transport adaptation efforts or require higher levels of adaptation. The EPA recommends that further consideration should be given to the potential for Transport adaptation actions to cause maladaptation more broadly; for example, the potential for greater pollution levels in receiving waters due to increased surface water runoff, or the potential to exacerbate existing social inequalities by focusing on adapting existing infrastructure without considering the provision of new infrastructure.

Maladaptation and wider environmental impact of the plan actions should be appropriately assessed.

The EPA is one of the statutory environmental authorities under the Strategic Environmental Assessment (SEA) Regulations. Prior to making your SEA screening determination you should consult with:

- Environmental Protection Agency;
- Minister for Housing, Local Government and Heritage;
- Minister for Climate, Energy and the Environment; and,
- Minister for Agriculture, Food, and the Marine.

As soon as practicable after making your determination as to whether or not SEA is required, you should make a copy of your decision, including, if appropriate, the reasons for not requiring an environmental assessment, available for public inspection in your offices and on your website. You should also send a copy of your determination to the relevant environmental authorities consulted.

The EPA's [Good Practice Guidance on SEA Screening](#) (EPA, 2021) provides guidance to assist plan makers and SEA practitioners. It elaborates of the steps needed for screening, the legislative landscape underpinning SEA screening, and step-by-step process and templates to assist in preparing the required documentation.

4. Cascading and Cross-Sectoral Impacts

Cascading impacts are defined as “impacts across the entire transport network associated with extreme weather events”. The plan has considered cascading impacts internally within the transport sector, rather than recognising that cascading impacts include those that cut across sectors. As an example, power outages causing various types of widespread disruption across the transport system are presented, which is a cascading risk, but other risks that cascade in to and out of the transport system are not adequately acknowledged. All cascading impacts relating to Transport highlighted by the NCCRA should be addressed in the Sectoral adaptation Plan— both cascading into and out of the sector. Examples of such cascading impacts include:

1. The loss of coastal protection ecosystem services may increase exposure of assets to coastal erosion and flooding (Biodiversity and Ecosystems impacts cascading into Transport), or
2. Disruption and damage to transport infrastructure can cause difficulty in accessing healthcare (Transport impacts cascading into Health impacts).

Cross-sectoral impacts are acknowledged to be between separate sectors but are only defined as impacts from transport into other sectors, rather than in both directions. The cross-sectoral adaptation actions in 6.2.1 seem to be referring to actions across the transport sector, further confusing the definition. The impacts that the transport sector has on the supply chain, health systems, and social systems are touched on but merit further attention. Cascading impacts were highlighted in the NCCRA with a table of cascading impacts supplied, which should be taken into account (Appendix E of the NCCRA Main Report and in supplementary material).

5. Indicators

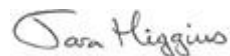
The EPA recognises that planning at a sub-sectoral asset-owner level is a key part of the adaptation planning process for transport infrastructure but would encourage stronger mechanisms to capture information about actions to deliver infrastructural and asset resilience in the sector. This could potentially be achieved via the monitoring and governance arrangements put in place to support the delivery of the plan.

Further Research

The EPA notes that key research gaps have been identified in the draft plan. The EPA would welcome engagement with the Department on the potential to address some of the identified research gaps through the [EPA's Fast Track to Policy](#) research funding programme, which provides for rapid turn-around evidence reviews to address urgent policy questions.

The EPA looks forward to continuing to work with your Department as part of the Sectoral Adaptation Planning process and is available to discuss any aspect of this submission.

Yours sincerely,



Dr Tara Higgins
Programme Manager

