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29/07/2025

EPAC Reference No-2125

**Re: Public Consultation on the draft Built & Archaeological
Heritage Climate Change Sectoral Adaptation Plan 2025**

Dear Sir/Madam,

The Environmental Protection Agency (EPA) welcomes the opportunity to respond to this consultation on the draft Built & Archaeological Heritage Climate Change Sectoral Adaptation Plan.

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) recently published by the EPA.

Overall, the draft SAP demonstrates good alignment with the National Adaptation Framework (NAF) 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 built & archaeological heritage policy, capital investment frameworks, and procurement processes while considering the key NAF principles of just resilience, Nature-based Solutions, and avoiding maladaptation. Similarly, we recommend that climate resilience be a core criterion in project appraisal and funding decisions, particularly for long-lived assets and infrastructure and we recognise the ambition of the draft SAP in these regards. We welcome that

indicators for the evaluation phase have been included in the plan and a structured approach is taken within the sector with biannual reporting and an interim review.

Key EPA recommendations

The EPA recognises many positive aspects of the plan, however, we have identified two 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;
2. Outcome indicators should be identified and integrated into the evaluation and reporting structures in place.

These points are further developed below.

1. Risk assessment and reference scenario

Contrary to the [Technical Guidance for Sectoral Risk Assessments](#) published by the EPA in 2024, the plan does not use the national alignment tables from the [NCCRA methodology](#) (Tables A.0.6 to A.0.11). The plan uses sea level rise and fluvial flood figures that do not appear to be aligned with the NCCRA alignment tables, meaning that RCP4.5 is not being used as a base reference scenario. 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 adaptation plans.

2. Indicators

The EPA recognises the inclusion of a proposed biannual and interim review structure to track and revisit the plan. We also recognise that planning in a cohesive, integrated way is a key part of the adaptation planning process for Built & Archaeological Heritage and that the actions are formulated using SMART principles with process indicators included in the monitoring and evaluation structure. However, the EPA recommends that outcome indicators should be developed for the actions proposed in this plan to enable tracking of improved resilience.

Actions should be clearly linked to measurable resilience outcomes, including the level of protection they provide. They should integrate climate-proofing, reflect updated climate and demographic projections, and address systemic interdependencies such as cascading impacts. Monitoring and data infrastructure must be strengthened to support adaptive management, and all actions should be underpinned by transparent, consistent criteria for evaluating progress.

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.

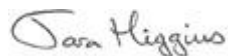
The EPA's [Good Practice Guidance on SEA Screening](#) (EPA, 2021) provides guidance to assist plan makers and SEA practitioners. It elaborates of the steps needed for screening, the legislative landscape underpinning SEA screening, and step-by-step process and templates to assist in preparing the required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

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