

CIOB response to Public consultation on the next update to the Climate Action Plan – Climate Priorities 2026

Introduction

The Chartered Institute of Building welcomes the opportunity to respond to the consultation on Climate Action Plan 2026. CIOB represents professionals working throughout the development, construction, conservation and improvement of the built environment. Our members have a direct role in delivering the buildings, infrastructure and places required to meet Ireland's climate objectives, and we therefore consider the construction sector to be both a significant source of emissions and an essential part of the solution.

Ireland has made progress in reducing emissions from the built environment, particularly through improved energy performance standards for new buildings and increasing levels of residential retrofit. However, the scale and pace of change required during the second carbon budget period is considerable. The Climate Change Advisory Council's 2026 assessment indicates that residential buildings are projected to exceed their 2026–2030 sectoral emissions ceiling by approximately 21.7%, while commercial and public buildings are projected to exceed theirs by approximately 62.2%.

This means that the next Climate Action Plan must move beyond incremental improvements. It needs to address the underlying structures that determine how Ireland's buildings are designed, constructed, occupied, renovated and ultimately replaced.

CIOB's view is that climate policy for the built environment should be organised around the whole life of a building. This means reducing operational emissions through energy efficiency and low-carbon heating, while simultaneously addressing embodied carbon, construction and demolition waste, the location and density of development, and the ability of buildings to adapt to changing needs.

In particular, we believe that Ireland needs to move towards a policy framework in which retrofit and reuse are the starting points for considering the future of existing buildings, while recognising that demolition and redevelopment will sometimes be the most sustainable option. Decisions should be based on whole-life carbon and wider environmental, economic and social impacts rather than on a simple presumption either for or against demolition.

At the same time, the Government has an opportunity to ensure that today's new buildings do not become tomorrow's obsolete buildings. CIOB's research on building adaptability demonstrates that relatively straightforward changes to planning and procurement policy could ensure that new buildings are capable of being adapted to changing uses over their lifetimes.

The Climate Action Plan should therefore connect climate policy much more explicitly with planning policy, housing policy, public procurement, taxation, skills and the circular economy.

Question 1: What are the key actions that should be included in Climate Action Plan 2026?

CIOB considers that the central priority for the built environment should be to accelerate the decarbonisation of Ireland's existing building stock while ensuring that new buildings are designed for long-term use, adaptability and low whole-life carbon.

The National Residential Retrofit Plan represents an important step forward, and the substantial increase in applications during early 2026 demonstrates that financial support can have a significant effect on household behaviour. However, the scale of the challenge remains considerable. The Climate Change Advisory Council reports that only 10,370 local-authority homes had been retrofitted since 2021 against a target of 36,500 by 2030. It has therefore recommended a sustained increase in funding to accelerate the retrofit of social housing.

CIOB supports a significant acceleration of retrofit, but believes that the next stage of policy should become more sophisticated than simply increasing the number of buildings receiving support. Government should measure the additionality generated by retrofit programmes: what is the proportion of retrofit investment and energy savings that would not have occurred without public intervention? This would allow funding to be targeted towards buildings and households where Government support can generate the greatest additional emissions reductions. CIOB has previously argued that priority social groups are likely to generate particularly high levels of additionality.

The Climate Action Plan should therefore establish a long-term national retrofit programme with clear annual delivery targets, but should also introduce stronger measures of carbon reduction, additionality, energy poverty and building performance. This would allow Government to assess whether public expenditure is producing the maximum possible climate benefit.

Retrofit policy should also be accompanied by independent advice and accessible finance. The Climate Change Advisory Council has highlighted the absence of a national network of independent energy renovation advisers and has identified the limitations of the current market-led one-stop-shop model. CIOB supports the development of a genuinely independent renovation advice service capable of helping building owners understand their options, develop staged retrofit plans and navigate available grants and finance.

The Plan should also establish a clear pathway for decarbonising commercial and public buildings. The Climate Change Advisory Council has previously called for a dedicated roadmap for commercial buildings, including targets for building upgrades and low-carbon technologies, but this has not yet been published. This should be addressed through Climate Action Plan 2026.

Finally, the Plan should give substantially greater attention to embodied carbon and building adaptability. Operational emissions will decline as Ireland's electricity system decarbonises and buildings become more energy efficient, but the embodied carbon associated with construction, materials, demolition and replacement will remain significant. In fact, it is projected to substantially increase to 2029.

CIOB therefore recommends that Climate Action Plan 2026 establish a whole-life approach to buildings, covering retrofit, reuse, adaptive reuse, embodied carbon, construction and demolition waste, low-carbon materials, adaptability and eventual end-of-life.

Question 2: What actions are required to accelerate emissions reductions in the built environment?

The most important change required is to move from treating buildings primarily as energy-consuming assets to treating them as long-term physical assets whose environmental impact extends across their entire life cycle.

Ireland's retrofit policy should continue to prioritise improving the energy performance of existing buildings and decarbonising heating. The Government should provide a clear long-term pathway for the phase-out of fossil-fuel heating, alongside sustained support for heat pumps, district heating and other appropriate low-carbon heating technologies. The Climate Change Advisory Council has emphasised the need for such a pathway and has also highlighted the potential for district heating to utilise waste heat from large energy users.

However, improving the existing stock cannot be separated from decisions about new development. Every building constructed today represents a substantial investment of materials and embodied carbon. If it is designed in a way that makes future adaptation difficult, there is a risk that its useful life will be shortened and that substantial carbon emissions will subsequently be incurred through refurbishment or demolition.

CIOB's research, *Building Adaptably: How the Construction Sector can Future Proof Irish Cities*, identifies a practical policy response. The research proposes that large-scale city-centre developments should be required to demonstrate design adaptability using a standardised framework such as EU Level(s) Indicator 2.3. Planning applications should also demonstrate plausible future renovation and conversion scenarios.

This would mean that an office building, for example, would not simply be assessed according to whether it meets today's office requirements. The planning process would also consider whether its structure, floorplates, servicing and internal configuration would allow it to be converted to residential or another use if future demand changes.

The physical characteristics required to achieve this are not necessarily technically complex. Generous floor-to-ceiling heights, relatively shallow floorplates, centralised cores, non-load-bearing internal partitions and accessible mechanical, electrical and plumbing systems can substantially improve the capacity of a building to accommodate future change.

CIOB therefore recommends that adaptability become a recognised climate-policy objective and be incorporated into planning policy for major urban development.

Question 3: How can planning and development policy contribute to climate action?

Planning policy is one of the most powerful tools available to Government for reducing the long-term carbon impact of the built environment. Climate policy cannot be separated from decisions about where buildings are located, how densely land is used and whether existing buildings are retained, adapted or replaced.

CIOB supports the continued emphasis on compact growth, urban regeneration and development in locations well served by public transport and existing infrastructure. Ireland's historic pattern of peripheral development has contributed to car dependency, infrastructure inefficiency and increased transport emissions. Locating more homes and employment in existing urban areas can therefore contribute to emissions reduction while also addressing housing need.

At the same time, planning policy should help prevent the creation of future stranded assets. CIOB recommends that all large-scale developments in central urban locations be required to demonstrate their adaptability using an established assessment framework such as EU Level(s) Indicator 2.3. The assessment should form part of the planning process rather than being treated solely as a voluntary sustainability exercise.

Planning applications for major commercial and residential schemes should also include future conversion or renovation scenarios. An applicant should be able to demonstrate, for example, how a proposed office building could accommodate residential use or other forms of mixed use in the future. This would encourage design decisions that extend the functional life of buildings and reduce the likelihood that changing market conditions result in vacancy followed by demolition.

CIOB also recommends that planning policy should provide positive incentives for adaptability. Developments that exceed defined adaptability benchmarks could benefit from expedited planning processes or additional development potential. This would create a direct economic incentive for developers to invest in modular, demountable and circular construction approaches.

This approach should be particularly focused on central urban locations. CIOB does not propose imposing identical adaptability requirements on every building regardless of context. The case for adaptability is strongest where the probability of changing land-use requirements is high and where the consequences of building obsolescence are particularly significant.

Planning policy should also introduce a more sophisticated approach to demolition.

CIOB supports a move away from the current presumption in favour of demolition and recognises the substantial environmental benefits of retaining and adapting existing buildings. However, a blanket policy against demolition would not necessarily produce the lowest overall emissions. In some urban locations, replacing a low-density building with a substantially more efficient and higher-density development can produce wider environmental benefits, particularly where it enables more people to live close to public transport and services.

The appropriate policy test should therefore be the long-term carbon and environmental consequences of the available options rather than the number of demolitions alone. CIOB has previously argued that appropriately qualified professionals should undertake pre-demolition assessments to establish the environmental and economic case for repair, retrofit, adaptive reuse or replacement.

Such an assessment would provide a much stronger evidence base for planning decisions and would avoid simplistic assumptions about whether retention or redevelopment is inherently more sustainable.

Where demolition is justified, CIOB supports mandatory independent pre-demolition waste audits. These should assess materials that can be reused or recycled and provide an objective assessment of construction and demolition waste. CIOB has previously identified concerns with relying on voluntary or self-regulated approaches and has advocated mandatory auditing systems involving appropriately trained specialists.

The planning system should therefore move towards a model in which retention, adaptation and redevelopment are considered systematically, with the decision informed by whole-life carbon, building adaptability, material reuse, location, density and wider environmental outcomes.

Question 4: What changes to policy, regulation and procurement are required?

Government has a particularly powerful role through the land it owns and the buildings it procures.

CIOB recommends that design-for-adaptability requirements be incorporated into the sale of public land and into public procurement contracts. Where public land is released for development, Government has an opportunity to require higher standards than might otherwise emerge from the market. Public procurement can similarly be used to create demand for adaptable, low-carbon and circular buildings. CIOB's research proposes precisely this approach, arguing that public-sector leadership can provide demonstration projects and establish new market expectations.

The same principle should apply to whole-life carbon. Public procurement should consider not simply the initial capital cost of a building but its expected environmental and operational performance over its life. Procurement criteria should reward buildings designed for long service life, adaptation, repair, maintenance, disassembly and material reuse.

The tax system should also be reviewed. CIOB has previously argued that Ireland's tax framework should do more to incentivise retrofit and repair relative to demolition and replacement. A tax system that imposes relatively greater costs on refurbishment than on replacement can unintentionally reinforce a carbon-intensive development model.

The Government should therefore examine the potential for VAT reform to create a stronger fiscal incentive for renovation, repair and retrofit. The objective should be to ensure that the tax system supports rather than undermines Ireland's climate and circular-economy objectives.

Climate Action Plan 2026 should also support the development of markets for reused and recycled construction materials. Regulatory barriers to the reuse of materials should be addressed where appropriate, while maintaining necessary standards for safety and performance. The aim should be to move from a model in which materials become waste when a building is demolished towards one in which buildings are regarded as repositories of valuable materials.

This will require better information. CIOB supports the development of pre-demolition assessments and material inventories capable of identifying materials and components available for reuse. This can support the development of secondary markets and improve the economics of circular construction.

Question 5: What are the major barriers to achieving the required emissions reductions?

The first major barrier is the fragmentation of policy. Climate, housing, planning, energy, taxation, construction and skills policy are often developed separately, despite the fact that they ultimately shape the same physical assets.

For example, a policy that encourages new housing construction without sufficiently considering location, adaptability or the reuse of existing buildings can work against climate objectives. Similarly, retrofit policy can be undermined if households cannot access finance, independent advice or appropriately skilled contractors.

The second major barrier is the lack of a sufficiently comprehensive whole-life-carbon approach. Ireland has made substantial progress in addressing operational energy use, but embodied carbon associated with materials, construction and demolition needs greater policy attention.

CIOB's response to the Net Zero Whole Life Carbon Roadmap argued that the policy framework should prioritise reuse and retrofit while recognising that demolition will sometimes be appropriate. It also argued for pre-demolition assessments and independent waste audits to improve decision-making and reduce construction and demolition waste.

The third barrier is the economics of retrofit and reuse. Building owners will not always choose the lowest-carbon option if that option has higher upfront costs or greater perceived risk. Public policy therefore needs to change the financial incentives facing building owners and developers.

The fourth barrier is planning capacity. The Oireachtas Joint Committee on Climate, Environment and Energy has identified uncertainty in planning and consenting, including inadequate resourcing and a lack of mandatory decision timeframes, as a barrier to climate delivery. Climate policy will not be delivered if the planning and regulatory systems required to implement it lack sufficient capacity.

The fifth barrier is skills. Retrofitting at scale, designing adaptable buildings, implementing whole-life-carbon assessment and delivering circular construction all require new and expanded professional and technical capabilities. CIOB's work on construction skills has identified deep retrofit and Modern Methods of Construction as priority areas for future training.

Government should therefore treat skills and industry capacity as an integral part of climate policy rather than as a separate issue. Construction SMEs in particular may struggle to invest in training, technology and sustainability-related innovation during periods of market uncertainty. CIOB has previously proposed the creation of a Green Skills or Innovation Fund to support SMEs investing in sustainability-focused research, development and skills.

Question 6: How can the transition be made fair and inclusive?

A successful transition in the built environment must address energy poverty and the unequal ability of households to invest in retrofit.

The households most in need of warmer, more efficient homes are often those least able to finance improvements themselves. CIOB therefore supports the continued prioritisation of vulnerable households and social housing within retrofit programmes.

However, fairness should also be considered in relation to the quality and longevity of the interventions being funded. Public investment should not simply maximise the number of individual measures installed. It should seek to deliver coherent retrofit programmes that improve the long-term performance, comfort and resilience of buildings.

Independent renovation advice will be particularly important in this regard. The Climate Change Advisory Council has highlighted the absence of an independent national advice network and the limitations of a predominantly market-led one-stop-shop model.

A fair transition also means ensuring that the construction workforce can participate in and benefit from the transition. Investment in deep retrofit, circular construction, adaptability and low-carbon materials will create new demand for skilled workers, but those workers need access to appropriate training and clear career pathways.

CIOB therefore recommends that Government align retrofit and climate investment with a long-term construction skills strategy, with particular emphasis on deep retrofit, building performance, whole-life carbon, circular construction and Modern Methods of Construction.

Question 7: What should Climate Action Plan 2026 do to address climate adaptation and resilience?

Climate adaptation should be integrated much more closely into building and planning policy.

Buildings constructed or substantially renovated today will remain in use for many decades. They therefore need to be capable of performing under a changing climate, including increasing risks from overheating, flooding, extreme weather and disruption to energy systems.

Retrofit provides an important opportunity to address these issues alongside energy performance. A well-designed retrofit should not simply reduce heating demand; it should consider ventilation, overheating, moisture, resilience and the ability of the building to accommodate future technologies.

Adaptability should similarly be regarded as a form of climate resilience. A building capable of changing use can remain useful as demographic, economic and environmental conditions change. This reduces the likelihood of premature obsolescence and the embodied carbon associated with repeated demolition and replacement.

CIOB's Building Adaptably research concludes that Ireland is well placed to introduce such a regime because City Development Plans already provide a governance framework through which spatially sensitive requirements can be introduced. The research recommends mandatory adaptability assessments for large-scale city-centre developments, conversion scenarios within planning applications, incentives for modular and circular construction, and adaptability requirements within public land sales and procurement.

These measures would allow Ireland to move from a reactive approach, in which buildings are adapted only after their original use has become obsolete, towards a proactive approach in which adaptability is designed into buildings from the outset.

Conclusion

CIOB believes that Climate Action Plan 2026 represents an opportunity to move Ireland's built-environment policy towards a genuinely whole-life approach.

The immediate priority must remain accelerating retrofit and the decarbonisation of heating. However, Ireland will not achieve its climate objectives through retrofit alone. It must also address the embodied carbon of new construction, the environmental consequences of demolition, the reuse of existing buildings, the location and density of development, the adaptability of new buildings, the circular use of materials and the capacity of the construction industry to deliver the necessary change.

The Government should therefore establish a long-term retrofit programme based not only on the number of buildings upgraded but on the additional emissions reductions generated by public intervention. It should provide independent renovation advice, improve access to finance and establish a clear pathway for the decarbonisation of commercial and public buildings.

Planning policy should place greater emphasis on compact growth, regeneration and adaptive reuse, while ensuring that decisions about demolition and redevelopment are based on whole-life carbon rather than simplistic assumptions. Major developments in central urban locations should be required to demonstrate their adaptability using an established framework such as EU Level(s) Indicator 2.3 and should provide plausible future conversion scenarios.

Public land and public procurement should be used to establish higher standards for adaptability, whole-life carbon and circular construction. Government should also examine fiscal measures, including VAT, that could better incentivise repair, renovation and retrofit relative to demolition and replacement.

Finally, none of these policies will succeed without sufficient planning capacity, finance, skills and construction-sector capacity. Climate Action Plan 2026 should therefore treat the construction industry not simply as a sector whose emissions need to be reduced, but as a critical delivery mechanism for Ireland's transition to a low-carbon and climate-resilient economy.

Ireland has an opportunity to move beyond a model in which buildings are designed for a single use and replaced when that use ends. Instead, buildings should be regarded as long-term assets capable of adaptation, repair, reuse and eventual disassembly. Doing so would reduce emissions and construction waste while also supporting housing delivery, urban regeneration, economic resilience and better use of Ireland's existing built environment. CIOB believes that embedding these principles within Climate Action Plan 2026 would represent a significant step towards a more sustainable and resilient built environment.