

Comhairle Contae Chill Dara
Kildare County Council



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23rd January 2019

Eastern and Midland Climate Action Regional Office submission to the Draft Regional Spatial and Economic Strategy.

Eastern & Midland Climate Action Regional Office (CARO), welcomes the opportunity to contribute to the public consultation on the EMRA Draft Regional Spatial and Economic Strategy. This submission is set out under the following headings:

1. **Background to E&M CARO**
2. **Local Authorities - Draft Climate Change Adaptation Strategies**
3. **Commentary on provisions of the draft RSES.**
4. **Conclusion**

For clarity please note that where the E&M CARO are suggesting amendments to the draft RSES text the following format is used:

- Text suggested for deletion is outlined in **red**;
- Suggested new additional text is outlined in **green**.

The comments on the draft RSES are in chronological order as matters arise within the strategy. Should you wish to seek clarification on any matter raised in this submission please do not hesitate to contact the Eastern & Midland Climate Action Regional Office.

Please note that the suggestions put forward in this submission represent the views and opinion of the E&M CARO and are not necessarily those of the constituent Local Authorities.

1. **Background to E&M CARO**

The Eastern & Midland CARO is one of four regional climate action offices that have been set up in 2018 in response to Action 8 of the 2018 National Adaptation Framework (NAF) – *Planning for a Climate Resilient Ireland*.

The four Climate Action Regional Offices have been established to drive climate action at both regional and local levels. In recognition of the significant obligation to develop and implement climate action measures, the four regional offices are mandated to co-ordinate engagement across the varying levels of government and help build on experience and expertise that exists in the area of climate change and climate action.

The composition of the four Climate Action Regions has been determined by the geographical and topographical characteristics, vulnerabilities and shared climate risks experienced across local authority areas. The four CARO regions, constituent local authorities and associated lead authorities are as follows:

Climate Action Region	Local Authority function area	Lead Authority
Eastern and Midlands	Carlow, Cavan, Kildare, Kilkenny, Laois, Leitrim, Longford, Louth, Meath, Monaghan, Offaly, Roscommon, Tipperary, Waterford, Westmeath, Wexford, Wicklow	Kildare County Council
Dublin Metropolitan	South Dublin, Fingal, Dun-Laoghaire-Rathdown, Dublin City	Dublin City Council
Atlantic Seaboard North	Donegal, Sligo, Mayo, Galway City & County	Mayo County Council
Atlantic Seaboard South	Clare, Limerick, Kerry, Cork City & County.	Cork County Council

Note: Mutual local authorities within the Eastern and Midland Climate Action Region and the EMRA Region are highlighted within the table.

Given the focus on geographical and topographical risk regions it is acknowledged that the CARO regional structure does not align with the Regional Assemblies regions. Notwithstanding this, it is important and anticipated that the E&M CARO will explore synergies further and collaborate in a meaningful manner with the EMRA. This provides, in the first instance, that local authority adaptation strategies align with the provisions of the E&M Regional Spatial and Economic Strategy and thereafter, ensures that a consistent, sustained and coordinated approach is maintained to drive climate adaptation in the region.

2. Local Authorities – Draft Climate Change Adaptation Strategies

Ireland's first statutory National Adaptation Framework (NAF) was published in January 2018. This sets out the national strategy to reduce the vulnerability of the country to the negative effects of climate change and to avail of positive impacts. The NAF was developed under the Climate Action and Low Carbon Development Act 2015. The NAF outlines a whole of government and society approach to climate adaptation in Ireland. All local authorities are required to prepare Climate Change Adaptation Strategies for adoption by their members by 30th September 2019. Work is ongoing in the 17 local authorities in the E&M Region on the preparation and development of local adaptation strategies for delivery by 30th September 2019.

The E&M CARO has a role in assisting and supporting local authorities in the development of these local authority adaptation strategies.

3. Commentary on provisions of the draft RSES

❖ Draft RSES - Vision and Guiding Principles (Page 21)

The E&M CARO welcomes the inclusion of Climate Action as a key principle of the Draft RSES, given the strategic importance of the RSES in the hierarchy of spatial plans and strategies across the Eastern and Midlands Region. Its inclusion as a key principle also supports and complements the National Planning Framework and its National Strategic Outcomes, in particular NSO No.8 – Transition to a Low Carbon and Climate Resilient Society.

❖ Section 7.6 Green and Blue Infrastructure Page 125, (Red Box) *Guiding principles for local authorities to follow in the preparation of Green Infrastructure Strategies:*

The E&M CARO proposes an additional guiding principle in this section as follows:

Suggest a specific emphasis on Carbon Sequestration, including research and development requirements, as a consideration in the preparation of Green Infrastructure Strategies, whereby certain areas can be considered as strategic and integral mechanism for the long term storage of carbon to mitigate the contribution of fossil fuels emissions and combat climate change.

❖ Regional Policy Objective 7.29 (page 134), Regional Decarbonisation Plan

The E&M CARO recommends the removal of RPO 7.29 in its entirety.

The preparation of a Regional Decarbonisation Plan is not identified in the National Mitigation Plan 2017 or National Adaptation Framework (NAF) 2018 and does not form part of the strategic function and related work programme of the CAROs. The compilation of a greenhouse gas emissions inventory and the ambit of a Regional Decarbonisation Plan, is currently provided for in a range of other existing and proposed work programmes, including the Environmental Protection Agency (EPA), the Sustainable Energy Authority of Ireland (SEAI) and the proposed Dublin Region Energy Master Plan.

❖ Regional Policy Objective 7.30 (page 134) – Sectoral emissions

The E&M CARO recommends the removal of RPO 7.30 in its entirety.

The Climate Action and Low Carbon Development Act 2015, National Mitigation Plan 2017 or National Adaptation Framework 2018 do not set out a statutory requirement to undertake sectoral mitigation plans, including sectoral emissions reductions targets. Accordingly, this does not form part of the strategic function and related work programme of the CAROs.

❖ Regional Policy Objective 7.31 (page 134) – Local adaptation strategies

The E&M CARO proposes rewording of text to avoid confusion and ensure consistency with the provisions of the Climate Act 2015 and the National Adaptation Framework 2018.

With the assistance and support of the Climate Action Regional Offices, Local Authorities shall develop, adopt and implement local climate adaptation strategies, which shall address issues including local vulnerability to climate risks and identify and prioritise actions, in accordance with the guiding principles of the National Adaptation Framework, National Mitigation Plan.

❖ Regional Policy Objective 7.32 (page 134) – Adaptation strategies

The E&M CARO proposes rewording of text to avoid confusion and ensure consistency with the provisions of the Climate Act 2015 and the National Adaptation Framework 2018.

RPO 7.32: *Climate Action Regional Offices shall provide ~~guidelines and~~ support to the Local Authorities on the development, adoption and implementation of local climate ~~action~~ adaptation strategies. ~~These guidelines shall include~~ Ongoing support should relate to the specific actions, and obligations and timescales for same that must be undertaken by the Local Authorities in accordance with local climate adaptation strategies and ~~to comply~~ compliance with national policy’.*

- ❖ **Mapping Projected Climate Impact Areas – proposed new RPO for insertion (in green text box) with Climate Change RPOs on page 134**

New RPO suggested to take account of work ongoing by the Environmental Protection Agency funded Urb-ADAPT project, which is being led by the Marine & Renewable Energy Institute (MaREI), University College Cork. There is potential for such analysis and related mapping outputs to be used in informing climate change adaptation policy in local authority plans and strategies.

Accordingly, it is considered that an additional Regional Policy Objective should be included in the Draft RSES as follows:

Local Authorities in the Region shall, as part of the development plan process, consider the identification and mapping of Projected Climate Impact Areas. These should include areas subject to projected future climate change risks and related impacts, for example urban heating, urban cooling, coastal erosion, flooding etc. Those areas identified as Projected Climate Impact Areas could be spatially represented by Local Authorities in County Development Plans, Strategic Development Zone Planning Schemes and Local Area Plans, as appropriate. The mapping of Projected Climate Impact Areas should directly inform the wording of policies, objectives and development management standards to inform the planning consent process. The identification of Projected Climate Impact Areas will take into account environmental safeguards and the protection of natural or built heritage features, biodiversity and views and prospects.

- ❖ **Page 135 - Decarbonising Electricity Generation**

The E&M CARO suggest additional text to title of section to better reflect the narrative.

Decarbonising Electricity and Heat Generation.

- ❖ **Regional Policy Objective 7.34 (Page 136) – Strategic Energy Zones**

The E&M CARO proposes rewording of text to provide for the inclusion of Strategic Renewable Energy Zones in local authority plans that cover a range of opportunities, in particular wind and solar energy, for application in both the urban and rural contexts. These SREZs can also be carried out in accordance with any relevant Local Authority Renewable Energy Strategies, Government guidelines and climate action frameworks.

RPO 7.34 ~~EMRA shall, in conjunction with~~ *Local Authorities in the Region shall, as part of the development plan process, consider the identification and mapping of Strategic Renewable Energy Zones, as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. Areas identified as Strategic Renewable Energy Zones could be spatially represented by Local Authorities in County Development Plans, Strategic Development Zone*

Planning Schemes and Local Area Plans, as appropriate. The mapping of Strategic Renewable Energy Zones should directly inform the wording of policies, objectives and development management standards, with regard to the planning consent process. The identification of Strategic Renewable Energy Zones for the Region will take into account environmental safeguards and the protection of natural or built heritage features, biodiversity and views and prospects. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy should be developed to support delivery of projects within the Strategic Energy Zones. A regional landscape strategy could be developed to support delivery of projects within the Strategic Renewable Energy Zones'.

❖ **Regional Policy Objective 7.37 (page 136) – heat mapping**

The E&M CARO proposes rewording of text to make provision for a range of opportunities including for example waste heat from data centres, industrial processes, power generation etc. Where appropriate, the mapping of District Heating Zones should inform the planning consent process and provide for environmental considerations.

RPO 7.37: Local Authorities in the Region shall consider the identification and mapping of District Heating Zones. These areas should include potential waste heat sources and adjoining / nearby sites considered suitable for connection to pilot / extension projects i.e. high density residential, mixed use developments etc. Areas identified as District Heating Zones can be spatially represented in County Development Plans, Strategic Development Zone Planning Schemes and Local Area Plans, as appropriate. The mapping of District Heating Zones should directly inform the wording of policies, objectives and development management standards, with regard to the planning consent process. The identification of District Heating Zones will take into account environmental safeguards and the protection of natural or built heritage features, biodiversity and views and prospects. Local Authorities shall consider the use of heat mapping to support developments which deliver energy efficiency and the recovery of energy that would otherwise be wasted. A feasibility assessment for district heating in Local Authority areas shall be carried out and statutory planning documents shall identify local waste heat sources'.

4: Conclusion

The Eastern & Midland Climate Action Regional Office welcomes the publication of the Draft Regional Spatial and Economic Strategy, and the opportunity to work with the Eastern & Midlands Regional Assembly, and the range of other identified stakeholders in the implementation of the final Strategy.

Kind regards,



Alan Dunney,
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Eastern and Midland Climate Action Regional Office

