

Heather Cooke

From: Anthony McNamara <[REDACTED]>
Sent: 23 January 2019 11:30
To: RSES
Cc: David Dodd
Subject: Dublin Metropolitan CARO submission on Draft RSES
Attachments: Dublin CARO Submission on Draft RSES FINAL.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Malachy,

Please find attached a submission from the Dublin Metropolitan Climate Action Regional Office on the EMRA Draft Regional Spatial & Economic Strategy.

Please do let me know if you have any questions on the contents of the attached submission.

We look forward to the adoption and implementation of the final Strategy.

Regards,

Anthony

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**Eastern and Midland Regional Assembly - Draft Regional Spatial and Economic Strategy –
Public Consultation
Comments from Dublin Metropolitan Climate Action Regional Office (CARO)**

The Dublin Metropolitan 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 CAROs**
- 2. Dublin Local Authorities - Draft Climate Change Action Plans 2019-2024**
- 3. Comments from Dublin Metropolitan Climate Action Regional Office**
- 4. Conclusion**

For clarity please note that where the CARO is 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 Draft RSES.

Should you wish to seek clarification on any matter raised in this submission please do not hesitate to contact the Dublin Metropolitan Climate Action Regional Office.

1. Background to CAROs

The Dublin Metropolitan 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
Dublin Metropolitan	South Dublin, Fingal, Dun-Laoghaire-Rathdown, Dublin City	Dublin City Council
Eastern and Midlands	Carlow, Cavan, Kildare, Kilkenny, Laois, Leitrim, Longford, Louth, Meath, Monaghan, Offaly, Roscommon, Tipperary, Waterford, Westmeath, Wexford, Wicklow	Kildare County 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

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 Dublin Metropolitan CARO and the Eastern and Midland 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 / climate change action plans 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 action in the regions.

2. Dublin Local Authorities – Draft Climate Change Action Plans 2019-2024

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. Under the NAF a number of Government Departments are required to prepare sectoral adaptation plans in relation to a priority area for which they are responsible. Under the NAF, each Local Authority is also required to make a local adaptation strategy by 30th September 2019.

The Dublin CARO has a role in assisting and supporting the Dublin local authorities in the development of these local authority adaptation strategies / climate change action plans.

Public consultation on the four Dublin local authority Draft Climate Change Action Plans is expected to commence on Monday 11th February 2019.

3. Comments from Dublin Metropolitan Climate Action Regional Office

In the Dublin Metropolitan Region, the four Dublin Draft Climate Change Action Plans have been prepared by Codema (Dublin's Energy Agency), following extensive and ongoing engagement with Dublin City Council, South Dublin County Council, Fingal County Council and Dun Laoghaire Rathdown County Council, throughout 2017/2018. The Draft Climate Change Action Plans address both climate change mitigation and adaptation for the following reasons:

- The Dublin local authorities were signatories to the EU Covenant of Mayors for Climate & Energy, in advance of the publication of the National Adaptation Framework. Accordingly, the approach for the Draft Climate Change Action Plans addressing both climate change adaptation and mitigation, is in line with the EU Covenant of Mayors for Climate & Energy methodology;
- Given the experience of Codema in developing Sustainable Energy Action Plans (and related Baseline Emissions Inventories), the completion of a Spatial Energy Demand Analysis for the four Dublin local authorities and related mapping outputs, a mitigation baseline and related actions are included in the Draft Climate Change Action Plans, thereby overlapping and complementing the adaptation sections of the Plans;
- The development of the Draft Climate Change Action Plans commenced in advance of the establishment of the Dublin Metropolitan Climate Action Regional Office and related work programme; and
- The Dublin CARO has adopted the approach to address both mitigation and adaptation in the preparation of the four Dublin Draft Climate Change Action Plans; however, the other three CAROs are currently assisting constituent local authorities in the preparation of climate change adaptation strategies.

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

Section 2.2 states that *'the draft Strategy is underpinned by key cross cutting principles that reflect the three pillars of sustainability: Social, Environmental and Economic and expressed in a manner which best reflects the challenge and opportunities of the Region'*. Climate Action, together with Healthy Placemaking and Economic Opportunity, are the three key principles of the Draft RSES. With regard to the Climate Action principle, Section 2.2 states, *'the need to enhance climate resilience and to accelerate a transition to a low carbon economy recognising the role of natural capital and ecosystem services in achieving this.*

The 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.

❖ **Integrated Land and Marine Planning (page 112)**

The Draft RSES promotes the sustainable development of marine and coastal areas, together with effective local community and stakeholder engagement. Section 7.2 states. *‘coastal erosion and flooding have the potential to seriously affect properties, businesses, transport infrastructure, coastal habitats and cultural heritage sites. Many areas are experiencing ‘coastal squeeze’ from increasing population and development pressured and the effects of climate change, with the east coast particularly vulnerable to sea level rise’.*

Section 7.2 also states, *‘the development of strategic coastal flood and erosion hazard maps for the national coastline, can be used by Local Authorities to inform assessment of potential hazards associated with future proposed development, to guide decisions on local coastal planning and development’.* The CARO welcomes the integration of marine planning and spatial planning, and the development of evidence based policy in this area.

The CARO wishes to acknowledge the significant potential for offshore renewable energy, with particular regard to wave and tidal energy. This issue is addressed in RPO 10.19 which states *‘support the sustainable development of Ireland’s offshore renewable energy resources in accordance with the Department of Communications, Energy and Natural Resources ‘Offshore Renewable Energy Development Plan’ and any successor thereof including any associated domestic and international grid connection enhancements’.*

The Regional Policy Objectives contained in the Draft RSES relating to integrated land and marine planning are considered acceptable and address the key areas of integration with relevant policy hierarchy, strategic management and stakeholder engagement, integration with statutory land use planning, sustainable growth of the seafood sector and maritime heritage. It is also noted that the CARO has made a submission on the National Marine Planning Framework – Baseline Report.

❖ **Flood Risk Management (page 118)**

Section 7.4 states, *‘The National Climate Change Adaptation Framework 2018 requires certain public bodies, including Local Authorities, to prepare local and sectoral adaptation plans. The planning system plays a major role in land use and flood management, integrated through the planning hierarchy at national, regional and local levels, and is central to the strategic flood risk management pillar of ‘Prevention’.*

The Draft RSES addresses flood risk management having adequate regard to the Catchment Flood Risk Assessment and Management (CFRAM) programme and the role of Strategic Flood Risk Assessment (SFRA) in assessing the existing and future flood risk in development

areas. The Regional Policy Objectives contained in the Draft RSES relating to flooding are considered acceptable and address the key areas of Strategic Flood Risk Assessment and the statutory land-use plan process, the CFRAM programme, the role of Flood Risk Management Plans, and the enhancement of biodiversity and amenity as part of flood risk management measures.

❖ **Green and Blue Infrastructure (page 122)**

The Draft RSES recognises the multiple benefits of Green and Blue Infrastructure including managing flood risk and adapting to climate change. Section 7.6 states, *'Green Infrastructure policy land use zonings are already embedded in some Local Authority Development Plans, allowing for the consideration of GI in local planning policy and decision making.* The CARO welcomes the spatial mapping of green and blue infrastructure areas in County Development Plans, Local Area Plans etc. across the Region. These outputs can be used to establish a common baseline across LA areas and act as the basis for a regional strategy in the context of developing further climate change adaptation projects at the local level.

❖ **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 CARO proposes an additional guiding principles in this section as follows:

Suggest a specific emphasis on Carbon Sequestration as a consideration by local authorities 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 7.28 (page 134)**

This RPO states *'within 1 year of the adoption of the RSES, the EMRA shall seek with other stakeholders to carry out an assessment of transport emissions in the Region to identify GHG forecasting and to analyse the emissions impacts of development in the Region'*. In support of RPO 7.28, the Draft RSES also states that, *'there is a need to inform the decision making at Core Strategy stage by the ability to assess the predicted impact of the potential land use on modal split and transport greenhouse gas emissions'*.

It is considered that an assessment of transport emissions for the Region, across transport modes, would have added value with regard to planning for climate change mitigation and integrated land use and transport policy development at local authority level i.e. County Development Plans, Strategic Development Zone Planning Schemes and Local Area Plans. Such an assessment should not only seek to identify GHG emissions but also air pollutants such as particulate matter (PM10/PM2.5) and nitrogen oxides (NOx). This assessment can also have input into ongoing research and policy approaches to air quality and public health in the Region. Such an assessment of transport emissions can include a variety of sources including National Transport Authority eastern regional transport model, Environmental Protection Agency inventories, Central Statistics Office data, National Car Test data etc. The

suitability and methodological approach to this RPO, should consider linking spatial RSES population growth projections, regional transport modal shift assumptions and related assessment of transport emissions in the Region.

❖ **Regional Policy Objective 7.29 (page 134)**

This RPO states ‘within one year of the publication of the RSES, the Climate Action Regional Offices shall compile a greenhouse gas emissions inventory for the Region to allow for planning of strategic mitigation action through a Regional Decarbonisation Plan. The Climate Action Regional Offices shall track the success of the Plan through annual inventories completed each year. Annual reporting of the inventories and critical analysis of the proposed measures will be undertaken to track progress within the Region and to track progress with national targets on a regional basis’.

The preparation of a Regional Decarbonisation Plan is not identified in the National Mitigation Plan 2017 or National Adaptation Framework (NAF) 2018, and as such does not form part of the strategic function and related work programme of the CAROs. Under the NAF each local authority is required to develop their own adaptation strategies in line with guidelines published¹ for the sector. Work on the development of strategies is currently being undertaken by individual local authorities with support from the Climate Action Regional Office in their region. Local authorities have been set a deadline for the completion of local strategies of 30th September 2019. In parallel, the 12 sectorial adaptation plans across 7 different government departments are being prepared for submission in September 2019.

It is also noted that Regional Decarbonisation Plan rationale, function and overlap with other plans and strategies, is not clearly outlined in the Draft RSES.

It is considered that 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, to be prepared by Codema (Dublin’s Energy Agency) addressing the four Dublin local authorities. Furthermore, it is considered that policies and objectives relating to the compilation of a greenhouse gas emissions inventory should be contained in national policy in the first instance, with clear direction on the use of such inventories at regional and local level.

The Government has published the Draft National Energy & Climate Plan 2021-2030. This first draft of the NECP takes into account energy and climate policies developed to date, the levels of demographic and economic growth identified in the Project 2040 process and

¹ Local Authority Adaptation Strategy Development Guidelines December 2018. Department of Communications Climate Action and Environment. <https://www.dccae.gov.ie/en-ie/climate-action/publications/Documents/14/LA%20Adaptation%20Guidelines.pdf>

includes all of the climate and energy measures set out in the National Development Plan 2018-2027. It is the first step in the process of putting together the final National Energy and Climate Plan and further iterations of the plan will take into account additional policies and measures and the all-of-Government climate action plan to be completed in early 2019. In the absence of a government approved NECP with agreed sectoral measures and actions, it is deemed premature to consider regional decarbonisation plan at this point.

With regards to National Emission Inventories, the Environmental Protection Agency (EPA) compiles Ireland's national greenhouse gas emission inventory on an annual basis. This inventory is submitted to the European Commission and UNFCCC each year by January 15th and April 15th respectively. Emissions data for the following gases is reported on an annual basis: Carbon Dioxide (CO₂), Methane (CH₄), Nitrous oxide (N₂O), Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs), Sulphur Hexafluoride (SF₆), and Nitrogen Trifluoride (NF₃). Emissions are classified into the ten following sectors; Agriculture, Transport, Energy Industries, Residential, Manufacturing Combustion, Industrial Processes, F Gases, Waste, Commercial Services and Public Services. The EPA also produce national air pollutant emission inventories². These inventories are reported annually to the European Commission under the National Emissions Ceiling Directive and to the UNECE under the Convention on Long-Range Transboundary Air Pollution. These pollutants are responsible for long-range transboundary air pollution such as acidification, eutrophication and ground-level ozone pollution.

Data on five key air pollutants, Nitrogen Oxides (NO_x), Sulphur Dioxide (SO₂), Non-Methane Volatile Organic Compounds (NMVOCs), Ammonia (NH₃) and Particulate Matter (PM_{2.5}) are reported to the European Commission as required under the National Emissions Ceiling Directive on an annual basis. In addition, carbon monoxide (CO) and particulate matter (PM), heavy metals and persistent organic pollutants are reported under the UNECE's Convention on Long-Range Transboundary Air Pollution every February.

An Informative Inventory Report (IIR) is available which describes the methodologies, input data, background information and the entire process of inventory compilation for air pollutants, as well as any improvements and recalculations of the inventories reported in previous submissions.

Emissions are not currently compiled and are not statutorily required on a county or Local Authority basis. EC and UNFCCC required country to sectoral level reporting. The most recent GHG emission inventory can be accessed at:

<http://www.epa.ie/pubs/reports/air/airemissions/ghgemissions2017/>

² Environmental Protection Agency, Emission Inventories.

<http://www.epa.ie/climate/emissionsinventoriesandprojections/nationalemissionsinventories/transboundarygasemissions/>

The public sector has mandatory energy efficiency targets. It is set in the context of Ireland's EU and national commitments and wider climate change goals, whereby a target of 33% energy efficiency improvement is to be achieved by all Irish public bodies (as defined in SI 426 of 2014) by 2020. Public bodies are required to report annual energy efficiency data to the Sustainable Energy Authority of Ireland (SEAI) which manages the reporting process on behalf of the Department of Communications, Climate Action and Environment (DCCAE). Approximately 94% of all public bodies are now using the online national energy monitoring and reporting (M&R) system established by SEAI and DCCAE, in addition to 62% of all schools. The monitoring and reporting system provides an important record of how the public sector performed in 2017. The data for 2017 shows that overall public sector energy efficiency gains have reached 24%³. This monitoring data could be included in the aforementioned mitigation baseline section of Local Authority Climate Adaptation strategies/Climate Change Action plans, where available.

The EPA has also funded the MapEire project, which is being led by Aarhus University, Denmark. The MapEire project has developed a high-resolution spatial mapping of the national Irish emission inventory. The work combines a large amount of statistical data with detailed spatial information to allow for a complete spatial emission mapping on a 1 kilometre by 1 kilometre resolution. The spatial model integrates official statistics, such as the Irish emission inventory, with a large number of spatial datasets as diverse as land cover, road network, building use and heat demand, selected through a comprehensive assessment of spatial available data. The model covers 32 pollutants and 177 sectors. The spatial mapping outputs of the MapEire project offers potential for a more detailed level of analysis where emissions are highest, allowing for more cost-effective initiatives on local, regional and national scale. The CAROs have been in contact with the EPA and MapEire project team in order to assess the outputs of the research for climate adaptation and mitigation purposes. Further information on this project is available at:

<http://projects.au.dk/MapEire/>

The CAROs and local authorities have no statutory role in compiling county level GHG inventories. While some local authorities, such as Dublin local authorities have been compiling GHG estimates for a number of years, these mainly relate to the functions and services of LAs.

Accordingly, it is recommended that a regional greenhouse gas emissions inventory and related Regional Decarbonisation Plan, are not required to be included in the Draft RSES and should, therefore, be omitted.

³ Annual Report 2018 on Public Sector Energy Efficiency Performance, Sustainable Energy Authority of Ireland. Available at: <https://www.seai.ie/resources/publications/Public-Sector-Annual-Report-2018.pdf>

❖ Regional Policy Objective 7.30 (page 134)

This RPO states 'on publication of the first regional emission inventory, the EMRA in conjunction with the Climate Action Regional Offices shall identify the sectoral emissions and assign a series of sectoral emissions reductions targets for each sector within the Regional Decarbonisation Plan. These emissions reductions targets will be based on an aggregate 40% reduction in greenhouse gas emissions by 2030 in line with the EU 2030 Framework'.

The Climate Action and Low Carbon Development Act 2015 and National Adaptation Framework require sectoral adaptation plans to be submitted to Government for approval. These plans are to include the following sectors: Seafood, Agriculture, Forestry, Biodiversity, Built and Architectural Heritage, Transport infrastructure, Electricity and Gas Networks, Communications networks, Flood Risk Management, Water Quality, Water Services Infrastructure and Health. There is currently no statutory requirement to undertake sectoral mitigation plans, including sectoral emissions reductions targets.

As stated above the preparation of a Regional Decarbonisation Plan is not identified in the National Mitigation Plan 2017, and as such does not form part of the strategic function and related work programme of the CAROs.

It is considered that the identification of sectoral emissions and related emissions targets, should be primarily addressed at a national level, in advance of addressing such issues at a regional level.

The Government has published the Draft National Energy & Climate Plan 2021-2030. This first draft of the NECP takes into account energy and climate policies developed to date, the levels of demographic and economic growth identified in the Project 2040 process and includes all of the climate and energy measures set out in the National Development Plan 2018-2027. It is the first step in the process of putting together the final National Energy and Climate Plan and further iterations of the plan will take into account additional policies and measures and the all-of-Government climate action plan to be completed in early 2019.

Accordingly, it is considered that RPO 7.30 is not required to be included in the Draft RSES and should, therefore, be omitted.

❖ Regional Policy Objective 7.31 (page 134)

This RPO states 'Local Authorities shall develop, adopt and implement local climate action strategies which shall assess local vulnerability to climate risks, quantify the emissions produced within their jurisdictions, and identify, cost and prioritise adaptation actions in accordance with the guiding principles of the National Adaptation Framework'.

Under the National Adaptation Framework, each Local Authority is required to make a local adaptation strategy by 30th September 2019. The four Dublin Draft Climate Change Action Plans have been prepared by Codema.

Given the experience of Codema in developing Sustainable Energy Action Plans (and related Baseline Emissions Inventory), the completion of a Spatial Energy Demand Analysis for the four Dublin local authorities and related mapping outputs, a mitigation baseline and related actions are included in the Draft Climate Change Action Plans, thereby overlapping and complementing the adaptation sections of the Plans. Accordingly, the methodological approach for the Climate Change Action Plans provides for both climate change adaptation and mitigation, and is in line with the EU Covenant of Mayors for Climate & Energy methodology. It is anticipated that the four Dublin Draft Climate Change Action Plans will be adopted by the end of Q2 2019.

The EPA and DCCAE have also developed the Climate Ireland⁴ platform. The Climate Ireland platform revolves around three key work areas:

1. Raising awareness and increasing understanding of climate change and climate adaptation;
2. Providing the information and data required for climate adaptation planning in Ireland;
3. Supporting the development of adaptation plans.

As the four Dublin Draft Climate Change Action Plans address both climate change mitigation and adaptation, and the potential for inclusion of mitigation baselines and related actions in other local authority strategies across the country, it is proposed that this RPO is re-worded as follows:

With the assistance and support of the Climate Action Regional Offices, Local Authorities shall develop, adopt and implement local climate adaptation strategies / climate change action plans, which shall address a range of issues including local vulnerability to climate risks, greenhouse gas emissions, and identify and prioritise actions, in accordance with the guiding principles of the National Adaptation Framework, National Mitigation Plan and other relevant climate action frameworks.

❖ **Regional Policy Objective 7.32 (page 134)**

This RPO states '*Climate Action Regional Offices shall provide guidelines and support to the Local Authorities on the development, adoption and implementation of local climate action strategies (both mitigation and adaptation). These guidelines shall include the specific actions and obligations and timescales for same that must be undertaken by the Local Authorities to comply with national policy*'.

One of the key functions of the CAROs is to assist local authorities in preparing their respective Climate Change Action Plans. It is also the role of the CAROs to ensure that the Plans are updated every five years to reflect latest policy, technology and climate-related impacts. Whilst it is not a key function of the CAROs to produce guidelines, the CAROs will work closely with local authorities to identify support requirements, having regard to the

⁴ Climate Ireland platform. <https://www.climateireland.ie/#/>

ongoing implementation of both climate change adaptation and mitigation actions included in the Action Plans.

It is recommended that RPO 7.32 should be worded as follows:

Climate Action Regional Offices shall provide ~~guidelines and~~ support to the Local Authorities on the development, adoption and implementation of local climate action strategies (which can address both adaption and mitigation). ~~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 / climate change action plans, and to comply with national policy'.

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

As stated above local authorities across Ireland are required to make a local adaptation strategy by 30th September 2019; these plans will include a baseline climate risk and vulnerability analysis. The CAROs recognise the potential to undertake further climate projections and spatial mapping of climate change impacts at local authority level, across various future year scenarios. In this regard the CARO wishes to acknowledge the Environmental Protection Agency funded Urb-ADAPT project, which is being led by the Marine & Renewable Energy Institute (MaREI), University College Cork. The Climate Ireland team have been instrumental in providing training and workshops for Local Authorities in 2017 and 2018 to assist in the preparation of climate adaptation strategies. The CARO will work with Climate Ireland to assist Local Authorities in the completion of the strategies and the further implementation and iteration of these strategies.

The main outputs of this project include the spatial mapping of various climate change risks for the Dublin Region, using a 2030 and 2050 future year horizon. 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. For example, there is potential to use Development Plan core strategy projections, settlement strategy hierarchies, land use zoning maps, and together with future climate risk analysis, to identify areas and land use types, that could be subject to increasing risk of climate change impacts i.e. urban heating, urban cooling, coastal erosion, flooding etc. This methodology could be replicated across local authority County Development Plans, SDZ Planning Schemes and Local Area Plans, where relevant and applicable.

It is recommended that Local Authorities be afforded flexibility in this regard. 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 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 can be spatially represented 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**

This section addresses the decarbonisation of both the electricity and heating sectors. The section text also makes reference to renewable electricity sources and district heating opportunities. Accordingly, this section should be re-titled as follows: Decarbonising Electricity and Heat Generation.

❖ **Regional Policy Objective 7.34 (Page 136)**

This RPO states 'EMRA shall, in conjunction with Local Authorities in the Region, identify Strategic 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. 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'.

The CARO acknowledges the need to advance evidence based and spatially represented climate change mitigation policy, that can be included in County Development Plans, Strategic Development Zone Planning Schemes, Local Area Plans and other local authority plans and strategies. The county spatial planning scale is considered the most appropriate stage for this policy intervention, with particular regard to the Development Management process. Accordingly, the inclusion of Strategic Renewable Energy Zones in local authority Plans could cover a range of opportunities, in particular wind and solar energy and could be applied in both the urban and rural context. Where appropriate, the mapping of Strategic Renewable Energy Zones should directly inform the wording of Plan policies, objectives and development management standards to inform the planning consent process.

Codema has secured funding under the SEAI Research, Development and Demonstration (RD&D) programme to undertake a Dublin Region Energy Master Plan. The Plan will create evidence-based, realistic, and costed pathways for the Dublin Region to achieve its carbon emission reduction targets to 2030 and 2050. The scenario analyses will include all areas of energy use in the Dublin Region, and will be evaluated based on the social, economic and environmental impacts. The resulting scenarios will give local authority and regional level planners, architects, engineers and other policy-makers the tools to create effective, low carbon policies and make strategic decisions to influence the use of energy in Dublin. The plan will focus on the areas where actions can be taken to introduce energy efficiency

measures and reduce CO2 emissions, such as district energy systems and renewable energy technologies. The Plan can bring added value to the development of evidence based and spatially linked climate change policy at local authority level.

It is considered that the mapping of Strategic Renewable Energy Zones should take account of the other requirements of any Plan making process at local authority level, with particular regard to environmental issues. For example, this would include taking account of Natural Heritage Areas, proposed Natural Heritage Areas, Special Areas of Conservation, Special Protection Areas and all other relevant environmental and landscape character issues. The complementary spatial consideration of Strategic Renewable Energy Zones in this context is considered most relevant at County Development Plan, SDZ Planning Scheme and Local Area Plan level. These shall also be carried out in accordance with any relevant Local Authority Renewable Energy Strategies, Government guidelines and climate action frameworks.

Having regard to the Draft RSES it is considered that whilst a regional landscape strategy, co-ordinated by the Eastern & Midlands Regional Assembly, can support the delivery of projects within Strategic Renewable Energy Zones, it should not be interpreted as a requirement to be delivered in tandem with relevant Plans at local authority level and the associated delivery of projects within the Strategic Energy Zones.

It is recommended that Local Authorities be afforded flexibility in this regard. Accordingly, it is recommended that RPO 7.34 should be reworded as follows:

~~EMRA shall, in conjunction with~~ **Local Authorities in the Region shall 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 can be spatially represented 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)**

This RPO states *'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’.

The CARO acknowledges the need to advance evidence based and spatially represented district heating policy, that can be included in County Development Plans, Strategic Development Zone Planning Schemes, Local Area Plans and other local authority plans and strategies. The County spatial planning scale is considered the most appropriate stage for this policy intervention, with particular regard to the Development Management process. This can include potential waste heat sources and adjoining areas considered suitable for connection to pilot / extension projects. There are currently two district heating projects in development in Dublin, the Dublin District Heating System (Dublin City Council) and the Tallaght District Heating System (South Dublin County Council). Both of these projects have benefited from evidence based climate change mitigation policies included in relevant County Development Plans. An [Energy Masterplan](#) was prepared as part of the Clonburris Strategic Development Zone Planning Scheme. This provided the basis for district heating network mapping and related policy included in the Planning Scheme. The Clonburris SDZ Planning Scheme is currently on appeal to An Bord Pleanala.

Accordingly, the mapping of District Heating Zones and supporting policy and objectives, could cover a range of opportunities, for example waste heat from data centres, industrial processes, power generation etc. Where appropriate, the mapping of District Heating Zones should directly inform the wording of Plan policies, objectives and development management standards to inform the planning consent process.

It is considered that the mapping of District Heating Zones should take account of the other requirements of any Plan making process at local authority level, with particular regard to environmental issues. For example, this would include taking account of Natural Heritage Areas, proposed Natural Heritage Areas, Special Areas of Conservation, Special Protection Areas and all other relevant environmental and landscape character issues.

It is recommended that Local Authorities be afforded flexibility in this regard. Accordingly, it is recommended that RPO 7.37 should be reworded as follows:

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'**~~

❖ **Regional Policy Objective 7.41 (page 138)**

This RPO states '*Local Authorities shall include proposals in statutory land use plans to facilitate and encourage an increase in electric vehicle use, including measures for more recharging facilities and prioritisation of parking for EVs in central locations*'. It is acknowledged that there will be an increase in domestic electric vehicle charging as the penetration of electric vehicles increases in Ireland. There is a need for increased EV infrastructure in other areas including streets, parking areas etc. The CARO welcomes the proposed role of statutory land use plans in facilitating an increase in electric vehicle use to include increased charging facilities and EV parking.

❖ **Regional Policy Objective 7.42 (page 139)**

RPO 7.42 states '*Climate Action Regional Offices and Local Authorities should consider the identification of critical infrastructure within their functional area, and particularly of the interdependencies between different types of sectoral infrastructure, as a first step in 'future-proofing' services and to help to inform longer term adaptation planning and investment priorities.*'

The CARO recognises the importance of identifying and safeguarding critical infrastructure as an important step in addressing local climate change adaptation. This is an important aspect and area of action of local climate change adaptation strategies. Local authorities can consider mapping critical infrastructure as the first step, in a co-ordinated and inter-local authority approach to safeguarding this infrastructure into the future. This approach can facilitate pursuing investment opportunities and participating in EU funded projects relating to best practice in future proofing critical infrastructure.

Local Authorities, with the assistance and support of the Climate Action Regional Offices should identify and assess the risk and vulnerabilities to critical infrastructure within their functional area, including interdependencies between different types of sectoral infrastructure, as a first step in 'future-proofing' services, as a practice in resilience and to help inform longer term adaptation planning and investment priorities.

4: Conclusion

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

Date: Wednesday 23rd January 2019

