

Ref: ELAP-D-27

Person / Body:

Department of Environment, Climate and Communications

Summary of submissions / observations:

This submission relates to a number of policy areas for which the Department is responsible and asks that the material outlined in their submission is taken into consideration in drafting the Edenderry Local Area Plan 2023-2029.

1. The dedicated chapter on climate action contained in the Draft LAP is welcomed. Transition to a sustainable transport system is supported in the context of the Local Transport Plan prepared alongside the Draft LAP. Decarbonisation and climate mitigation actions which enhance the delivery of carbon sinks is also welcomed. The Local Authority should ensure the Local Area Plan is drafted in a manner consistent with the latest Climate Action Plan 2023 and in accordance with the Climate Action and Low Carbon Development Act, 2015.
2. The Department supports the efforts of the Local Authority in improving the energy efficiency of homes and the reduction of greenhouse gas emissions. Consideration may be given to the mandatory installation of heat pumps for existing buildings during energy efficient upgrades/retrofitting.
3. The submission notes the upgraded renewable energy targets contained in CAP 2023 and request that the Local Authority should have regard to these updated targets with new energy projects within the Local Area /when drafting the Local Area Plan.
4. The Department welcomes the acknowledgement of compact growth and the potential of district heating objectives contained in the NPF. Explicit policies on district heating in the Draft LAP are encouraged, particularly in line with Regional Policy Objective 7.38 of the RSES.
5. National policy objectives in relation to 5G rollout should be further emphasised. Ducting and other assets owned by the state should be published for access seekers. Suitable urban and suburban locations should be identified for 5G/small cell deployment.
6. The Local Authority's adoption of circular economy principles within the Draft LAP and in line with CAP 2023 is noted and supported.
7. The submission attaches further observations from Geological Survey Ireland (GSI). The submission from GSI notes the inclusion of geothermal data and mention of their ground source heating/cooling suitability maps in the Draft LAP. GSI also recommend their available data sets are used when conducting EIAR, SEA, planning and scoping processes. Use of GSI data or maps should be attributed correctly to 'Geological Survey Ireland'.

CE Response:

1. The Department's comments are noted and welcomed. The Draft Plan is informed by National level policy documents such as the Climate Action Plan and any subsequent editions. CAEP-07 as set out in Chapter 3 of the Offaly County Development Plan 2021-2027 states the following:

"CAEP-07 It is Council policy to support and facilitate European and national objectives for climate adaptation and mitigation as detailed in the following documents, taking into account

other provisions Offaly County Development Plan 2021-2027 Chapter 3 Climate Action and Energy Page 91 of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage);

- *Climate Action Plan (2019 and any subsequent versions);*
- *National Mitigation Plan 2017 (or subsequent editions);*
- *National Climate Change Adaptation Framework (2018 and any subsequent versions);*
- *Relevant provisions of any Sectoral Adaptation Plans prepared to comply with the requirements of the Climate Action and Low Carbon Development Act 2015, including those seeking to contribute towards the National Transition Objective, to pursue, and achieve, the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of the year 2050; and*
- *Offaly Climate Change Adaptation Strategy.”*

Chapter 8 of the Draft Edenderry LAP sets out specific climate action policies and objectives that are considered to be complementary to the provisions of the higher order national and county level policy documents. The Draft Edenderry LAP has taken due cognisance of the Climate Action Plan 2023 and provides adequate climate action measures for the plan period.

The Climate Action and Low Carbon Development (Amendment) Act 2021 is referred to at the end of section 8.1 of the draft LAP where it states:

‘Such measures strive to adhere to the provisions of the Climate Action and Low Carbon (Amendment) Act 2021 which sets binding targets for greenhouse gas emissions reduction and for the delivery of renewable electricity’.

2. The Department’s comments in relation to energy efficiency and reducing energy demand is noted and welcomed. The inclusion of policies requiring the mandatory installation of heat pumps in energy efficient upgrades is considered inappropriate given the cost implications of requiring such an upgrade when other measures such as insulation, sustainable energy production, smart meters could be used to improve the energy rating of a dwelling. Until such time as specific guidance is provided with regard to mandatory installation of heat pumps in retrofit projects, I recommend no amendment to the Draft LAP on foot of this point of the submission.
3. The Draft LAP contains adequate policies and objectives to support the provision of renewable energy in the Edenderry Area, particularly when considered in addition to the policy context within the County Development Plan. I recommend to further strengthen CAP-01 as contained in the Draft LAP with the following:
CAP-01 Support the transition of Edenderry to a competitive, low carbon, climate resilient and environmentally sustainable town by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency, particularly with regard to the updated renewable energy targets contained in Climate Action Plan 2023.
4. The following policy is provided in the draft LAP: **CAP-10** Promote the use of district heating systems as a decarbonising technology for the built environment powered by renewable fuel sources and/or waste heat in new residential and commercial developments where such development does not have a negative impact on the surrounding environment, landscape, biodiversity or local amenities.

I recommend adding a new objective to Section 8.9 of the Draft LAP, to support the provision of district heating as follows:

“CAP-XX: Support the undertaking of a feasibility assessment for District Heating in Edenderry subject to the availability of resources.”

5. I recommend amending Policy CIP-10 of Chapter 9 of the Draft LAP as follows:

CIP-10 *Promote and facilitate the development and renewal of energy and communications networks in Edenderry, including 5G rollout, while protecting the amenities of the town.*

There is a variety of resources available to the public to identify existing assets for those wishing to seek access. It is not a function of the Local Area Planning process to publish inventories of such assets and identification of suitable locations for 5G/small cell deployment is considered premature and not appropriate for the LAP process. I therefore do not recommend any alterations to the Local area Plan on foot of this point of the submission.

6. Noted.
7. As specified in the Strategic Environmental Assessment (SEA) GSI data sets have been appropriately utilised and referenced in the preparation of the Draft LAP. I therefore do not recommend any alterations to the draft plan on foot of this point of the submission.