



Forward Planning Section,
Offaly County Council,
Áras an Chontae,
Charleville Road,
Tullamore,
County Offaly
R35 F893

03rd February 2023

RE: Preparation of the Draft Edenderry Local Area Plan 2023-2029

Dear Sir / Madam,

Further to the notice given to this Department of the publication of an invitation for submissions on the Draft Edenderry Local Area Plan (the Draft LAP), the following submission outlines its observations in respect of a number of policy areas for which the Department is responsible.

The Department of the Environment, Climate and Communications' vision of a climate neutral, sustainable, and digitally connected Ireland will be achieved by collaboratively delivering policies and programmes to empower people, communities, and businesses to continue the transition to a better quality of life for current and future generations. The step change in our ambition from a low carbon to climate neutral Ireland requires strong leadership across Government and the wider public sector. This Department will drive the climate agenda by engaging with local authorities to build resilience in citizens, communities, and business to overcome climate adaptation challenges, maximising climate mitigation and adaptation opportunities and facilitating the transition to a truly Circular Economy.



The Department asks that you take the material outlined in the following sections into consideration when drafting the Edenderry Local Area Plan, which align with our Statement of Strategy for the period 2021-2023, [Le Chéile 23](#), which itself sets out our vision, mission, and five strategic goals in key policy areas.

Climate Action

The Department welcomes the inclusion of a dedicated chapter to Climate Action in the Draft LAP and the manner in which it is set out provides the public with a useful guide to how climate action is embedded in the Draft LAP.

The Climate Action Plan 2023 (CAP 2023) commits the Government to reducing transport emissions by 50% from 2018 emissions rates. To facilitate the reduction in greenhouse gas emissions, CAP 2023 supports the transition towards a sustainable transport system, through enhanced land-use planning, public transport, active travel, vehicle efficiency and clean fuels.

The Department, therefore, notes and supports the Local Authority's facilitation of the reduction of greenhouse gas emissions from transport, under the Local Transport Plan for Edenderry, in line with the National Climate Action Plan.

The Local Authority's integration of a sustainable transport system is also supported, in particular, the promotion of compact growth and land-use planning, which reduces the need to travel (Section 8.2 Integration of land use Planning and sustainable mobility).

The Department supports decarbonisation actions and projects implemented by the Local Authority, in particular, strengthening public transport linkages and encourage their use, and supporting the growth of Electric Vehicles through a recharging infrastructure (Climate Action Policy-04).



The inclusion of climate mitigation actions adopted by the Local Authority which enhance the delivery of carbon sinks, through the provision of wetlands and biodiversity zones, for example, wetlands, bogs, forestry and grasslands (Table 8.1: Decarbonisation Actions and Projects), is also welcomed.

The Local Authority's commitment to promote the repair and reuse of existing buildings is noted and supported, which furthers the objectives of compact growth. The Department supports compact development through enhanced spatial and land use planning (Table 8.1: Decarbonisation Actions and Projects).

The Department notes the next iteration of the CAP 2023, was launched on the 21st of December 2022. The Local Authority should, therefore, ensure that the Local Area Plan is drafted in a manner consistent with this latest CAP 2023, in accordance with Section 15(1) of the Climate Action and Low Carbon Development Act, 2015 (as amended).

Built Environment

The Department supports the Local Authority's efforts to improve the energy efficiency of homes and public buildings for the reduction of greenhouse gas emissions and the provision of homes which are warmer, more comfortable and cheaper to heat (Section 8.5.2 Energy Efficiency- Homes and Public Buildings).



The Local Authority's acknowledgement of new buildings significant role in reducing energy demand and the promotion of energy efficient designs of new builds is supported by the Department (Section 8.5.2 Energy Efficiency- Homes and Public Buildings). CAP 2023 requires that all new dwellings are designed and constructed to Nearly Zero Building standards by 2025, and Zero Emission Building standards by 2030, with 170,000 new dwellings using heat pumps by 2025, and 280,000 by 2030. It is considered that the Draft LAP generally aligns with the commitments of the Government with regard to energy efficiency and the installation of heat pumps in new buildings (Climate Action Policy-12) and CAP 2023 action BE/23/2. However, consideration may be given to the mandatory installation of heat pumps for existing buildings during the energy efficient upgrades/retrofitting, in line with the National Retrofit Plan and in advance of the outputs of CAP 2023 action 23/2.

The Department welcomes the Local Authority's continued provision of energy efficient upgrades for social housing and retrofiring of existing buildings to BER level B2, which furthers the retrofitting commitments of the Government as set out in CAP 2023 BE/23/11 (Section 8.5.2 Energy Efficiency- Homes and Public Buildings refers).

Renewables

The Local Authority should note that the Government has increased its ambitions for renewable energy generation under the CAP 2023:- Solar PV Capacity targets have been updated to 5GW by 2025 and 8GW by 2030. Onshore wind capacity has increased to 6GW by 2025 and 9GW by 2030.

The Department supports the Local Authority's commitment to increasing renewable energy, as stated in Climate Action Policy-01. The Local Authority should have regard to the updated renewable energy targets when developing renewable energy projects within the Local Area/when drafting the Local Area Plan.

The Department recommends that the Local Authority further elaborate on the role of renewables within Edenderry, in particular, the role of self-consumers and appropriately scaled renewable developments/projects.



District Heating

We note that Chapter 8 of the Draft Plan, which concerns '*Climate Action*', is cognisant of the National Planning Framework focus on compact growth and also acknowledges the potential for such compact growth to facilitate the development of low carbon district heating.

We welcome the fact that the Draft Plan takes notes of Strategic Outcome 9 of the NPF and, in particular, that '*District heating networks will be developed, where technically feasible and cost effective, to assist in meeting renewable heat targets and reduce Ireland's GHG emissions.*' (National Strategic Outcome 9, National Planning Framework, Pg 149 ([National Planning Framework](#))).

We note that the Draft Plan acknowledges the potential of district heating including district heating derived from waste heat. The Plan recognises the potential of District Heating Systems to reduce our dependency on fossil fuels and our carbon emissions (section 8.5.4 Low Carbon District Heating) and this is supported.

We note and support the inclusion of an objective Climate Action Policy-10: to '*promote the use of district heating systems as a decarbonising technology for the built environment powered by renewable fuel sources and/or waste heat...*'. As such, explicit policies in support of same are encouraged.



The Department highlights Regional Policy Objective 7.38 of the [Eastern and Midland Regional Assembly Regional Spatial & Economic Strategy](#) (RSES), which is supportive of the development of district heating and the use of heat mapping to support developments and feasibility studies:

Regional Policy Objective 7.38 of the EMRA RSES states that: ‘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.’ Where data centre developments are approved in the County, the Council will expect district heating systems to be developed for adjoining residential, community and/or commercial developments.’¹

The Department considers that the Local Authority has an opportunity to commit to undertaking a feasibility assessment for District Heating in Edenderry, pursuant to Regional Policy Objective 7.38.

Telecommunications

We consider that national policy objectives in terms of digitalisation, 5G rollout and enhancing Ireland’s national and international connectivity can be further underlined and supported by County Councils and Local Authorities via specific reference to these areas in the Draft Local Area Plan. In particular, a direct callout in the draft Local Area Plan of supporting 5G rollout would be welcome from the Departments perspective.

For ducting and other assets owned by the State, we would encourage a commitment to publish inventories of these assets and develop a streamlined process to allow for easy accessibility for access seekers.

¹ Regional Policy Objective 7.38, Eastern and Midland Regional Assembly RSES, Pg 179 ([Eastern and Midland Regional Assembly Regional Spatial & Economic Strategy](#))



Regarding 5G /Small Cell deployment we would encourage a commitment to identify suitable urban and suburban locations owned by the State for Masts/Small Cells to support smart town initiatives/programmes.

Waste

Generally, with respect to the development of waste policy, County Councils should consult directly with their respective [Regional Waste Management Planning Office](#) regarding development of the final plans.

CAP 2023 actions relating to waste include the implementation of the Waste Action Plan for a Circular Economy (WAP). The focus of the WAP is on increasing recycling and minimizing waste generation by prioritising the prevention of waste at every opportunity. The Local Authority's adoption of circular economy principles, in line with CAP 2023 is noted and supported (Section 8.5.6 Circular Economy and further set out in Section 9.5).

Geological Survey Ireland

Further observations from Geological Survey Ireland, a Division of this Department, are attached for consideration in the preparation of the final LAP.



Conclusion

We would be grateful if Offaly County Council would take these matters under consideration in the drafting of the Edenderry Local Area Plan 2023-2029.

Department officials can make themselves available for a discussion on any matters raised in this submission or any other matters within the remit of the Department of the Environment, Climate and Communications relevant to the preparation of this plan.

Officials can provide support to the County Council in the following areas:

- Climate Action, Engagement and Adaptation
- Energy Generation and Networks
- Energy Use / Demand in the Built Environment
- The Circular Economy
- Communications
- Environmental Policy and Governance
- Waste and Natural Resources (including geosciences)

Please direct any requests for further consultation to PlanningNotifications@decc.gov.ie

Regards,

Planning Advisory Division

Department of Environment, Climate and Communications

Encl. Divisional observations from Geological Survey Ireland



Forward Planning
Planning Section
Offaly County Council
Tullamore
Co. Offaly

17 January 2023

Re: Draft Edenderry Local Area Plan 2023-2029

Your Ref: n/a

Our Ref: 23/07 [c.f. 22/375]

Dear Sir/Madam,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your email received on the 05 January 2023, concerning the Draft Edenderry Local Area Plan 2023-2029, Geological Survey Ireland would like to make the following additional comments since our last response 22/375.

Geothermal Energy

In Chapter 8 'Climate Action' Section 8.5.5 'Geothermal Energy', we are pleased to see the inclusion of geothermal data and mention of our ground source heating/cooling suitability maps.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Dr. Clare Glanville
Senior Geologist
Geological Survey Ireland

Trish Smullen
Geoheritage and Planning Programme
Geological Survey Ireland