Development Plan Team,

Planning and Property Development Department,

Block 4, Floor 3,

Civic Offices,

Wood Quay,

Dublin 8.

D08 RF3F

1st September 2022

Dear Sir / Madam,

**RE: Proposed Material Alterations to the Draft Dublin City Development Plan 2022 - 2028**

Further to the notice given to the Department of the Environment, Climate and Communications (the Department) of the publication of the Proposed Material Alterations to the Draft Dublin City Development Plan 2022-2028, the following submission outlines its observations in respect of a number of specific policy areas for which the Department is responsible.

As a whole, the Department notes the commitment to strengthening the Draft Plan in the areas of climate action, energy use in the built environment, the circular economy and sustainable development and the amended referencing to the most up-to-date national policy documents and strategies relating to same to support the proposed material alterations (as particularly expressed in Material Alteration Reference No. ES:1.2).

**Climate Action**

The Council is commended for seeking to supplement the Draft Plan with a range of proposed material alterations that bolster its climate action ambitions. This Department notes the proposed alterations to update the references to the National Climate Action Plan, 2021 and passing of the Climate Action and Low Carbon Development (Amendment) Act, 2021 and generally supports the range of proposed alterations relating to climate action, change, adaptation and mitigation (Material Alteration Reference No. 3.5), the re-use of buildings (Material Alteration Reference Nos. 3.9, 3.10 and 15.2) and the promotion of new technologies such as electric vehicles (Material Alteration Reference No. 3.27).

The Council is commended for its ambitious targets to reduce greenhouse gas emissions by 55% and carbon neutrality by 2050, as per the Covenant of Mayors, which furthers the national emissions targets as required by the Climate Action and Low Carbon Development (Amendment) Act 2021 (Material Alteration Reference No. 3.2).

**District Heating**

Dublin City Council demonstrates a significant commitment to the development of District Heating through the proposed Material Alterations at Chapter 3. The Department welcomes the amendments proposed by the Council in this respect, it is considered that they ensure the robustness of its support for district heating and contribute to laying the foundations for the appropriate expansion of district heating in the Dublin City administrative area (Material Alteration Reference Nos. 3.14, 3.18 - 3.25 and 13.5 refer).

**Circular Economy**

The additional references to the principles of circularity and the transition from a linear to a circular model to keep resources in use as long as possible are particularly noted and welcomed.

In particular, Material Amendment Reference Nos. ES:1.2, 1.4, 3.12, 3.26, 9.15, 9.16, 9.17, 9.18 and 15.2 are noted and supported. The Council is commended for its approach to addressing the Circular Economy in the proposed material alterations.

**Energy Utilities**

The proposed Material Amendment no. 9.20 is considered to support the objectives of both the National Energy Security Framework (April 2022) and the Government’s Policy Statement on Security of Electricity Supply (November 2021) and is therefore welcomed. The retention of existing electricity generation capacity and continued investment in energy infrastructure (including gas), are critical components of Irelands energy security. As this is an increasingly evolving policy space, the Council is requested to consider adding *“the National Energy Security Framework and any emerging national policies relating to energy and electricity supply or security”* to the final line of the proposed amendment (after the reference to “Shaping our Electricity Future”) in order to future-proof this section (acknowledging that only minor amendments may be considered at this stage).

**Onshore Renewable Energy**

The proposed material alterations contain some significant and positive references to renewable energy and the Department particularly welcomes the inclusion of refences to targets for renewable energy at Material Alteration Reference Nos. 3.13 and the strengthening of the intent and effect of policies referred to in Material Alteration Nos. 3.14, 3.15 and 3.17.

The Council is encouraged to engage directly with the Renewable Electricity Division of this Department in the formulation of any future, more detailed, plans for renewable energy generation of all types (including solar).

**Offshore Renewable Energy**

This Department welcomes the amended reference to the 2014 “Offshore Renewable Energy Development Plan *and any forthcoming review”* (Material Alteration Reference No. 3.16 refers).

**Conclusion**

This Department considers that the amendments referred to above strengthen the Draft Plan in the areas concerned and should be included in the final Plan. We would be grateful if Dublin City Council would take these observations under consideration in the finalisation of the City Development Plan.

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 additional support to the City Council in the following areas:

* Climate Action, Engagement and Adaptation
* The Circular Economy
* Energy Generation and Networks
* Energy Use / Demand in the Built Environment
* Communications
* Environmental Policy and Governance
* Natural Resources

Please direct any requests for further consultation to [PlanningNotifications@DECC.gov.ie](mailto:PlanningNotifications@DECC.gov.ie)

Regards,

Paul O’Neill, Principal Officer

Planning Advisory Division

Department of the Environment, Climate and Communications