



# Greystones-Delgany & Kilcoole Local Area Plan Submission - Report

<b>Who are you:</b>	State Body
<b>Name:</b>	Department of the Environment, Climate and Communications
<b>Email Address:</b>	PlanningNotifications@decc.gov.ie
<b>Reference:</b>	GDKLAP-134007
<b>Submission Made</b>	January 29, 2024 1:45 PM

## Topic

Heritage - Biodiversity- Green infrastructure- Climate Action- Energy

## Submission

Please see attached a submission on behalf of the Department of the Environment, Climate and Communications.

## File

20240129\_DECC FINAL Submission.pdf, 0.27MB



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29<sup>th</sup> January 2024

**RE: Preparation of the Draft Greystones-Delgany and Kilcoole Local Area Plan  
2024-2030**

Dear Sir / Madam,

Further to the notice given to this Department of the publication of an invitation for submissions on the pre-draft stage of the Greystones-Delgany and Kilcoole Local Area Plan (the Plan), 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 Greystones-Delgany and Kilcoole 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.

### **Wicklow County Development Plan (WCDP) 2022-2028**

The Planning and Development Acts 2000 (as amended) require the LAP to be consistent with the objectives of the Development Plan and its Core Strategy. In this regard, DECC note the positive objectives of the WCDP 2022-2028 which places climate action as a strategic principle of the plan. Objectives at County level for climate action, renewable energy infrastructure, communications infrastructure inter alia should be reflected by objectives and actions of the LAP, as relevant for the plan area, to support implementation of national, regional and county level policy on these themes.

The following recommendations, which are reflected in the Department's previous submission for the WCDP review process, are an opportunity to strengthen objectives of the LAP.

### **Climate Action**

The [Climate Action and Low Carbon Development \(Amendment\) Act 2021 \(Climate Act 2021\)](#) amends the Climate Action and Low Carbon Development Act 2015 and sets Ireland on a legally binding path to net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade. The significantly strengthened legally binding framework established under the Climate Act, with clear targets and commitments set in law, will help ensure that Ireland achieves its national, EU and international climate goals and obligations in the near and long-term. In this regard, we would draw the Council's attention to Section 15(1) of the principal Act (as amended), which requires public bodies to *"..perform its functions in a manner consistent with –*

*(a) the most recent approved climate action plan,*

*(b) the most recent approved national long term climate action strategy,*



*(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*

*(d) the furtherance of the national climate objective, and*

*(e) the objective of mitigation greenhouse gas emissions and adapting to the effects of climate change in the State”*

The [Climate Action Plan 2023](#) (CAP23) was the first climate plan adopted on a statutory basis and is currently being updated as [Climate Action Plan 2024](#) (CAP24), which sets a roadmap for taking decisive action to halve our overall greenhouse gas emissions by 2030 and setting Ireland on a path to reach net-zero emissions by no later than 2050, as committed to in the Programme for Government and set out in the Climate Act 2021.<sup>1</sup> The Plan lists the actions needed to deliver on our climate targets and sets indicative ranges of emissions reductions for each sector of the economy. We request that the County Council consider how the actions set out therein can be incorporated into the Local Area Plan, where relevant.

We request the Local Authority consider the following when finalising the LAP:

- The [Long-term Strategy on Greenhouse Gas Emissions Reductions](#) which sets out indicative pathways, beyond 2030, towards achieving carbon neutrality for Ireland by 2050.
- Ireland’s [National Climate Objective](#) and the [European Climate Law](#).
- The [National Adaption Framework](#) (NAF) which 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. A new NAF is currently being developed by the Department and a draft is due to be completed by early 2024
- In all matters relating to Climate Action, local authorities should consult directly with their own CAROs.

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<sup>1</sup> The Department notes the CAP24 is open for public consultation in early 2024 and will be adopted in early 2024.



The Climate Act 2021 sets out that each local authority shall prepare and make a plan, referred to as a Local Authority Climate Action Plan (LA CAP), specifying the mitigation and adaptation measures to be adopted for a period of five years. The plans represent a new opportunity to further embed climate mitigation and adaptation in local authority Development Plans and will enhance local authorities' ability to lead, coordinate and become agents of change in response to the ongoing climate change crisis. The plans are due to be adopted in early 2024. The preparation of the LAP is a positive opportunity to support the implementation of WCDP 2022-2028 objectives for climate action and support the implementation of the Wicklow County Climate Action Plan.

Recommendation 1:

Consistent with climate action policies and objectives of the WCDP 2022-2028, the LAP should support the implementation of the national Climate Action Plan and the Wicklow Council Climate Action Plan through the preparation of effective objectives and actions for climate action in LAP area.

**Transport**

The CAP24 commits the Government to reducing transport emissions by 50% from 2018 emissions rates. To facilitate the reduction in greenhouse gas emissions, CAP24 supports a significant increase in sustainable transport trips, through enhanced land-use planning, public transport, active travel, vehicle efficiency, 20% reduction in total vehicle kilometres, 50% reduction in fuel usage, fleet electrification and biofuels.

Recommendation 2:

The Local Authority is requested to consider the measures within the CAP24 relating to sustainable mobility and reducing the demand for transport journeys by private vehicles (Avoid-Shift -Improve Framework) through more effective land use and transport planning integration and compact growth principles when drafting the Local Area Plan.



## **Land Use, Land Use Change and Forestry**

The Department would like to bring to the Local Authority's attention the call for the integration of bioeconomy policy development into the planning framework, under Action 5.1 of the [Bioeconomy Action Plan 2023 – 2025](#). This action seeks to enhance bioeconomy governance in Local Authorities and improve policy making for the bioeconomy to address climate action, green economy, enterprise, and economic development.

### **Recommendation 3:**

The Local Authority is requested to consider the Actions of the Bioeconomy Action Plan 2023-2025 including Action 5.1, as relevant for the plan area, when drafting the Local Area Plan.

## **Renewable Energy**

The target of delivering up to 80% of Ireland's electricity from renewable sources by 2030, as set out in the [National Development Plan 2021-2023](#) (NDP) and the CAP24, will come from a combination of onshore and offshore renewable sources. Regular [Renewable Electricity Support Scheme](#) (RESS) auctions will deliver competitive levels of onshore wind and solar electricity generation.

The Local Authority should note the Government's renewable energy generation targets under the CAP24: Solar PV Capacity targets of up to 5GW by 2025 and 8GW by 2030. Onshore wind capacity of 6GW by 2025 and 9GW by 2030.

The CAP24 includes actions to accelerate renewable electricity generation:

- By delivering a streamlined electricity generation grid connection policy and process, and remove barriers, where possible, for the installation of renewables and flexible technologies reducing the need to build new grid, including hybrid (wind/solar/storage) connections.



- Ensuring that the permit-granting procedure, the planning, construction and operation of renewable energy plants, the connection of such plants to the grid, the related grid itself, and storage assets are presumed as being in the overriding public interest.

We also note the objective of the Local Authority to support the development and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required.<sup>2</sup>

#### Recommendation 4:

The Department note the objective of the Local Authority to facilitate and support the development of small-scale electricity generation installations.<sup>3</sup> As such, we would encourage the inclusion of an objective of the Council in the LAP to promote the development of appropriately scaled renewable energy installations (rooftop solar, geothermal energy and other types of installations appropriate to urban environments) and to support the development of additional supporting grid infrastructure. It is crucial that all counties look to continue to increase their contribution to the national renewable electricity generation target and, where possible, aim for developments that are carbon or energy use neutral.

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<sup>2</sup> Wicklow County Development Plan 2022-2028, Volume 1- Written Statement, Chapter 16 Energy & Information Infrastructure, CPO 16.18

<sup>3</sup> Wicklow County Development Plan 2022-2028, Volume 1- Written Statement, Chapter 16 Energy & Information Infrastructure, CPO 16.15



Response no. 25 of the [National Energy Security Framework](#) (NESF) proposes to align all elements of the planning system to fully support accelerated renewable energy development and ensure that the local planning policy framework “fully supports the national objectives.” The NESF provides an overarching and comprehensive response to Ireland’s energy security needs in the context of the war in Ukraine. The Framework outlines the structures which are in place within Government to monitor and manage our energy supplies. It sets out the plans which are in place to deal with energy security emergencies should they arise and outlines out how these plans will be tested in light of the war in Ukraine. This includes shifting away from fossil fuel energy generation and use. A key aspect of this is local, community-based approaches to renewable energy, the reduction in the reliance on the grid transmission system (through local and domestic generation) and through microgeneration.

Recommendation 5:

The LAP should include objectives supporting local and community based renewable energy projects to address Government policy and strategy for sustainable, secure and affordable energy.

The Department notes the following measure of the CAP24 with regard to the required acceleration of renewable electricity generation and the potential use of existing State infrastructure:

*‘All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution’<sup>4</sup>*

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<sup>4</sup> Section 12.4.1 Climate Action Plan 2024.





#### Recommendation 6:

We encourage the Local Authority to not include policy which protects road infrastructure over grid infrastructure in the final LAP.

### **Retrofitting**

The Programme for Government and the CAP24 set ambitious targets to retrofit 500,000 homes to a Building Energy Rating of B2 (or cost optimal equivalent) by 2030, and to install 400,000 heat pumps in existing dwellings, to replace existing heating systems by 2030. This represents approximately 25% of the housing stock and is among the most ambitious retrofit programmes worldwide. The review of the NDP resulted in an unprecedented financial commitment to support achievement of the Government's retrofit targets including a €43m investment in the Community Energy Grant Scheme which includes grants for public, commercial and community buildings. The ambitious National Retrofit Plan, sets out how the Government will deliver its ambitious retrofitting targets. The Plan identified an €8 billion Exchequer commitment to 2030 to support homeowners to upgrade their homes through SEAI home energy grant schemes including free energy upgrades for households at risk of energy poverty. It is designed to address barriers to retrofit across four key pillars: driving demand and activity; financing and funding; supply chain, skills, and standards; and governance. For each pillar, barriers were identified and timebound policies, measures and actions were put in place to address them.

The Department notes regional policy objective 7.40 of the Eastern and Midland Regional Spatial and Economic Strategy, which states:

*'Local authorities shall include policies in statutory land use plans to promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock and energy efficiency in traditional buildings. All new buildings within the Region will be required to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD).'*



We also note the objective of the Local Authority to support and facilitate development of alternative and renewable sources of energy, particularly in the generation of electricity / heating and for use as transport fuel,<sup>5</sup> and the Local Authority's facilitation of the retrofitting of existing building with heat saving devices and installations, where permission is required for such works.<sup>6</sup>

#### Recommendation 7:

The Local Authority should be mindful of the regional policy objective and County Development Plan when drafting the Local Area Plan and explore how it can effectively be implemented at local level, for example, by identifying retrofitting initiative priorities within the Greystones-Delgany and Kilcoole local area, supporting initiatives that seek retrofitting infrastructure to existing buildings and provide for policies to implement same.

### Heat and District Heating

The [National Heat Study](#) provides a comprehensive assessment of the options available to decarbonise Ireland's energy used for heating and cooling homes, businesses, and industry. Options available include the electrification of heating. The CAP24 adopts measures to support the electrification of heating by strengthening our existing Building Regulations and implementing an ambitious National Residential Retrofit Plan. Targets set are 170,000 new dwellings using heat pumps by 2025, and 400,000 by 2030, and 45,000 existing dwellings using heat pumps by 2025, and 400,000 by 2030. The Local Authority is requested to consider the development of the electrification of heating during the preparation of the Local Area Plan, having regard to the CAP24.

We would also note Response no. 17 of the National Energy Security Framework, which (building on specific actions in the Climate Action Plan) seeks to reduce the reliance on fossil fuel heating systems.

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<sup>5</sup> Wicklow County Development Plan 2022-2028, Volume 1- Written Statement, Chapter 16 Energy & Information Infrastructure, CPO 16.01.

<sup>6</sup> Wicklow County Development Plan 2022-2028, Volume 1- Written Statement, Chapter 16 Energy & Information Infrastructure,, CPO 16.33.



#### Recommendation 8:

The Local Area Plan should include development management objectives to achieve the ambition of reducing reliance on fossil fuel heating systems.

### **Compact Growth and District Heating**

When preparing the draft Local Area Plan, due regard should be given to the ambition of the National Planning Framework, Regional Spatial and Economic Strategy and WCDP 2022-2028 which requires the achievement of compact growth and explicitly recognises the potential for such compact growth to facilitate the development of low carbon district heating.

Examples include:

- National Planning Framework: *'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'*.<sup>7</sup>
- Regional Policy Objective 7.38: *'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'*.<sup>8</sup>
- CPO 16.34: *'To support the development of district heating systems, particularly those generating heat from renewable sources.'*<sup>9</sup>

The Department therefore encourages the Local Authority to examine the potential of district heating including district heating derived from waste heat, where available, technically feasible and cost effective and commit to carrying out a feasibility exercise and the use of heat mapping in support of same in the draft policies. As such, policies in support of same are encouraged in the Draft Greystones-Delgany and Kilcoole Local Area Plan. The Heat Policy Division is available to provide guidance and support in this regard.

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<sup>7</sup> National Strategic Outcome 9, [National Planning Framework](#), Pg 149

<sup>8</sup> Regional Policy Objective 7.38, Eastern and Midlands Regional Spatial & Economic Strategy

<sup>9</sup> Wicklow County Development Plan 2022-2028, Volume 1- Written Statement, Chapter 16 Energy & Information Infrastructure, CPO 16.34



#### Recommendation 9:

The Local Area Plan should emphasise the importance of appropriate spatial planning in climate change action, particularly achieving compact growth as prioritised across national, regional and county level planning policy to reduce greenhouse gas emissions and facilitate more sustainable infrastructure provision, including low carbon district heating.

### **Circular Economy**

The Circular Economy is an alternative to the predominant ‘take-make-waste’ linear economic model. Meeting Ireland’s climate action targets requires a transition to a circular economy which protects and restores our environment through sustainable resource use, as 45% of global emissions come from current systems of production and resource consumption. The challenge Ireland faced was around creating a policy or framework that would radically shift focus back to the start of the product life cycle, to focus on prevention and designing out waste, and to effect behavioural change at an individual, household, and business level. This policy is set out in the government’s [Waste Action Plan for a Circular Economy](#), and the Whole-of-Government Circular Economy Strategy.

The [Circular Economy Act 2022](#), will ensure all households have access to and use segregated waste services and incentivise the commercial sector to increase waste separation, as well as providing waste authorities with new tools to tackle illegal dumping. The Act also provides for the reconfiguration of the Environment Fund to become Ireland’s Circular Economy Fund, ring-fenced to support environment and circular economy projects and initiatives.



Ireland's first [Whole of Government Circular Economy Strategy](#) was approved by Government and launched last year. This first iteration of the Circular Economy Strategy marked a significant milestone in Ireland's transition towards greater circularity. In tandem with the Strategy, the EPA developed a new Circular Economy Programme. This new programme will be a driving force in Ireland's move to a circular economy by businesses, householders, and the public sector. The Council is requested to consider all aspects of how it can support the transition to a circular economy in the preparation of the local area plan. The Department encourages the Local Authority to support and promote circular economy principles within the LAP.

The Department notes the objective of the Local Authority in the Wicklow County Development Plan 2022-2028, CPO 9.21, which states:

*'To encourage and facilitate the 'circular economy' and the development of 'green' industries, including industries relating to renewable energy and energy-efficient technologies, material / waste recycling and conservation'.*

The Department advise the Local Authority to consult with their respective [Regional Waste Management Planning Office](#) regarding development of the LAP.

Recommendation 10:

The Local Area Plan should support circular economy principles in the Greystones-Delgany and Kilcoole Local Area Plan and implement policy for same.

### **Waste Management**

The Department draws the Local Authority's attention to the new guidance in respect of construction waste management, titled "*Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects*". The purpose of these guidelines is to provide a practical approach to construction and demolition (C&D) which is informed by best practice in the prevention and management of C&D wastes and resources from design through to construction and deconstruction.



The Department advise the Local Authority to consult with their respective [Regional Waste Management Planning Office](#) regarding development of the LAP.

Recommendation 11:

The Local Area Plan should have regard to the guidance “*Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects*” and give effect to them through the objectives of the plan.

### **Geoscience Policy**

The Department encourages the Local Authority to consider the following when finalising the LAP:

- [Policy Statement on Mineral Exploration and Mining](#) which puts in place a clear and sustainable policy framework that can play a role in Ireland’s transition to a circular economy and net-zero greenhouse gas emissions.
- [Policy Statement on Geothermal Energy for a Circular Economy](#) which outlines the regulatory framework, highlights the requirement for meaningful engagement with the public, and for further work in the collection of data on Ireland’s geothermal resources.

The Department notes the objective of the Local Authority in the Wicklow County Development Plan 2022-2028, CPO 16.16, which states:

*‘To facilitate the exploration of geothermal energy where such development does not have a negative impact on the surrounding environment, landscape, biodiversity or local amenities’.*

Recommendation 12:

We would encourage the Local Authority to consider the policy where relevant for the LAP area.



## **Geoscience Data**

A list of Geological Survey Ireland's (GSI) Publicly Available Datasets Relevant to Planning, EIA and SEA processes, following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018(S.I. No. 296 of 2018), is attached to this submission provides the datasets available for the following areas:

- Land & Soil
- Water
- Landscape
- Air and
- Climate

The maps and data listed in the attached chart are available on the Geological Survey Ireland map viewer. Please read all disclaimers carefully when using Geological Survey Ireland data.

## **Telecommunications**

Ireland's national and international digital connectivity is critically important to maintaining and enhancing Ireland's competitiveness in global markets and in the knowledge and information economy while supporting the shaping of Europe's digital future. This Department provides digital policy leadership and foster investment in high quality communications infrastructure while driving digital entrepreneurship and innovation and promoting the digital society at national, European, and international levels.

An agile, responsive, and resilient digital infrastructure is needed to support the development of the digital economy while improved cyber security will build trust and confidence in online activities and support digital transformation for the benefit of every citizen, business, and community in Ireland. The creation of a gigabit and fully connected digital society, that safeguards the citizen in their use of digital services and applications will promote the use of digital services to meet societal needs, foster innovation and enhance the quality of citizens' lives.



Last year the Government published a new national digital strategy, [Harnessing Digital – The Digital Ireland Framework](#), to drive and enable the digital transition across the Irish economy and society. Dimension 2 of the framework places importance on supporting 5G rollout across all populated areas of Ireland by 2030.

National Strategic Objective 6 of the NDP states that high-quality, secure, and reliable connectivity to global telecommunications networks is of significant strategic importance to the Irish State. To achieve this Ireland must develop high capacity and diverse connectivity routes directly to mainland Europe, whilst continuing to encourage investment in cable projects from North America to Ireland. Further measures may be required over time in order to leverage the private investment required to further develop international connectivity to mainland Europe and to ensure that Ireland becomes a central connectivity hub.

It is considered that national policy objectives in terms of digitalisation, 5G rollout and enhancing Ireland's national and international connectivity outlined in those policy documents can be further underlined and supported by Local Authorities via specific reference to these matters in Local Area Plans. Such support is provided in the WCDP 2022-2028 through communication objectives CPO 16.35 to 16.39. Aligned objectives in the LAP will support implementation of these objectives.

Recommendation 13:

The Local Area Plan should provide objectives in support of digital communication infrastructure, in particular direct support for 5G rollout and the National Broadband Plan. Further measures to consider include:

- 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. In particular, specific support for 5G infrastructure in the draft Local Area Plan would be welcome from a DECC perspective.





- With respect to Smart programmes, we would encourage a commitment to replicate smart programmes / initiatives across all towns and villages across the county.



## **Conclusion**

We would be grateful if Wicklow County Council would take these matters under consideration in the drafting of the Greystones-Delgany and Kilcoole Local Area 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 support to Wicklow 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](mailto:PlanningNotifications@decc.gov.ie)

Yours sincerely,

Planning Advisory Division

Department of Environment, Climate and Communications

Encl. List of Recommendations



## Recommendations

### Recommendation 1:

Consistent with climate action policies and objectives of the WCDP 2022-2028, the LAP should support the implementation of the national Climate Action Plan and the Wicklow Council Climate Action Plan through the preparation of effective objectives and actions for climate action in LAP area.

### Recommendation 2:

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The Local Authority is requested to consider the Actions of the Bioeconomy Action Plan 2023-2025 including Action 5.1, as relevant for the plan area, when drafting the Local Area Plan.

### Recommendation 4:

The Department note the objective of the Local Authority to facilitate and support the development of small-scale electricity generation installations.<sup>10</sup> As such, we would encourage the inclusion of an objective of the Council in the LAP to promote the development of appropriately scaled renewable energy installations (rooftop solar, geothermal energy and other types of installations appropriate to urban environments) and to support the development of additional supporting grid infrastructure. It is crucial that all counties look to continue to increase their contribution to the national renewable electricity generation target and, where possible, aim for developments that are carbon or energy use neutral.

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<sup>10</sup> Wicklow County Development Plan 2022-2028, Volume 1- Written Statement, Chapter 16 Energy & Information Infrastructure, CPO 16.15



Recommendation 5:

The LAP should include objectives supporting local and community based renewable energy projects to address Government policy and strategy for sustainable, secure and affordable energy.

Recommendation 6:

We encourage the Local Authority to not include policy which protects road infrastructure over grid infrastructure in the final LAP.

Recommendation 7:

The Local Authority should be mindful of the regional policy objective and County Development Plan when drafting the Local Area Plan and explore how it can effectively be implemented at local level, for example, by identifying retrofitting initiative priorities within the Greystones-Delgany and Kilcoole local area, supporting initiatives that seek retrofitting infrastructure to existing buildings and provide for policies to implement same.

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The Local Area Plan should emphasise the importance of appropriate spatial planning in climate change action, particularly achieving compact growth as prioritised across national, regional and county level planning policy to reduce greenhouse gas emissions and facilitate more sustainable infrastructure provision, including low carbon district heating.

Recommendation 10:

The Local Area Plan should support circular economy principles in the Greystones-Delgany and Kilcoole Local Area Plan and implement policy for same.



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Recommendation 12:

We would encourage the Local Authority to consider the policy where relevant for the LAP area.

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Further measures to consider include:

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- With respect to Smart programmes, we would encourage a commitment to replicate smart programmes / initiatives across all towns and villages across the county.