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Planning Department
Kildare County Council
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Tuesday, 24th May 2022
[Via Consultation Portal]

Dear Sir/Madam,

RE: SUBMISSION TO DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-2029 ON BEHALF OF DAVY PLATFORM ICAV (IRELAND) AND KILDARE INNOVATION CAMPUS, LEIXLIP, REGARDING ANCILLARY ENERGY FACILITIES FOR INDUSTRIAL DEVELOPMENT AND THE USE OF CARBON CREDITS.

1.0 INTRODUCTION

Davy Platform ICAV (Ireland)[1] has retained Tom Phillips + Associates[2] ("TPA") to make this submission in respect of the *Draft Kildare County Development Plan* 2023-2029 (KDP), as opened for public consultation for a period up to the 24th May 2022.

Facing increases in the demands for energy, further industrial development may have to rely on the ancillary auto-generation of energy on-site using a mixture of renewable energy generation and the consistent supply of power from conventional Natural Gas ancillary energy facilities. The use of Carbon Credits could 100% offset emissions from gas-fired ancillary energy facilities and contribute to lowering emissions globally.

Furthermore, the installation of ancillary energy facilities that are capable of using both conventional gas fuels and other fuels that are not yet commercially widespread (e.g. biogas, hydrogen) would future proof industrial development for the transition to a carbon neutral economy. The approach of 100% offsetting the use of conventional gas fuels in these facilities using Carbon Credits ensures that the intermediate stage of this transition is Carbon Neutral. The purchased Carbon Credits could also play their part in investing in the required hydrogen/biogas/other infrastructure, hastening the transition to these fuels.

We seek to amend the Draft Kildare County Development Plan 2023-2029 to provide certainty that further industrial development can avail of this approach.

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2.0 KILDARE INNOVATION CAMPUS

2.1 REGENERATION OF FORMER HEWLETT-PACKARD SITE INTO KILDARE INNOVATION CAMPUS

In June 2021 the former Hewlett-Packard site (henceforth referred to as Kildare Innovation Campus) in Leixlip, Co. Kildare was purchased by Davy Platform ICAV (Ireland), Liffey Sub Fund.

The Hewlett-Packard site stood out to the fund as an exceptional investment opportunity with significant untapped value creation potential. The current uses on the site can be described in broad terms as a mix of industry and declining manufacturing. Repositioning to appropriate new uses on this site has the potential to achieve long term capital and income growth.

The overall vision for the lands is to re-establish the widely recognised importance of the former Hewlett-Packard site as "Kildare Innovation Campus", a major scientific and technological hub, thereby contributing to the already booming Knowledge Economy which characterises Kildare and its neighbouring counties.

The development of the Kildare Innovation Campus concept on the site will be accomplished through a masterplan which will facilitate the transition over time from existing industry and manufacturing to uses which include Life Sciences, ICT & Ancillary Offices. This would result in the provision of potentially c. 175,000 sq m Science & Technology related floor space alongside the generation of c. 4,000 jobs across the campus.

Figure 1: Former Hewlett-Packard site at Leixlip, Co. Kildare. (Source: TPA Presentation to OPW, May 2022.)

3.0 FURTHER INDUSTRIAL DEVELOPMENT AND INCREASING ENERGY DEMANDS: RECENT TRENDS AND AVENUES FOR INCREASING ENERGY SUPPLY

We wish to commend Kildare County Council at the outset for their preparation of a draft County Development Plan that both makes strong policy statements towards the transition to a low-carbon economy and supports further industrial development. However, current issues affecting the continued development of Industry in Ireland may warrant some further amendments to the *Draft Plan*.

3.1 ANCILLARY ON-SITE ENERGY GENERATION

It is recognised that Ireland currently is experiencing increased demand for energy due to continued economic growth and the relaxation of restrictions arising from the Covid-19 Pandemic. The National Competitiveness & Productivity Council's *Bulletin 22-1 Energy Security* outlines the challenges faced to meet growing demand during the transition to a low-carbon economy, stating that EirGrid forecast a growth in electricity demand of between 28% and 43% over the coming decade.

On that basis, it is likely that the provision of on-site ancillary auto-generation capabilities to provide for the energy needs of operations will be a necessary feature of industrial development in the near future.

EC O5	Support and encourage the sustainable development of renewable energy auto production units (the production of energy primarily for on-site usage) for existing and proposed developments in line with relevant design criteria, amenity and heritage considerations and the proper planning and sustainable development of the area.

Policy ECO5 of the *Draft Kildare County Development Plan 2023-2029* supports the auto-generation of energy for on-site use in the continued development of industry.

However, the definition of 'renewable' in this context leaves ambiguity as to whether a conventional gas-fired ancillary energy generation facility would be supported by this policy if 100% offset by carbon credits.

3.2 USE OF NATURAL GAS

Although increased investment in renewable energy generation continues, the technical challenges involved may prove to constrain further industrial development. Further industrial development, especially Life Sciences and ICT uses, will require a significant, stable and consistent supply of energy. Whether this renewable energy generation is provided on-site or obtained from the National Grid, the fluctuation of energy supply provided by renewable generation would not be sufficient to supply in whole, or substantially in part, such industrial operations. The National Competitiveness & Productivity Council again state in *Bulletin 22-1 Energy Security*:

> '*The intended increased use of renewables in the energy system adds to the challenge of ensuring a stable and reliable electricity supply, because the balance between available supply and peak demand becomes very tight when there is limited wind generated power. Renewable generation that is predominantly wind powered can vary between 1% and 70% on a given day, making the supply of electricity less stable.*

> *Similar conditions in Northern Ireland and Great Britain limit the capacity for interconnection to mitigate these risks. This increases the likelihood of more frequent system alerts, system emergencies and potentially electricity customers losing power.'* (pg. 4)

On this basis, it is likely that the necessary consistent ancillary auto-generation capabilities on industrial sites will have to utilise conventional natural gas energy generation.

This approach is supported by the Department of the Environment, Climate and Communication's *Policy Statement on Security of Electricity Supply* published 30th November 2021, which states:

> '*the development of new conventional generation (**including gas-fired and gasoil/distillate-fired generation**) is a national priority and should be permitted and supported in order to ensure security of electricity supply and support the growth of renewable electricity generation.'* (pg. 5, our emphasis)

Section 7.16 of the *Draft Kildare County Development Plan 2023-2029* describes natural gas as:

> '*The cleanest of all fossil fuels and its chemical composition makes it a more environmentally friendly fuel than oil, coal or peat.*'

This would support the provision of ancillary energy facilities based on natural gas over other more polluting fossil fuels.

However, the need for the further provision of conventional gas-fired energy generation facilities (either as part of the transition to a low-carbon economy or the meeting of increasing energy demands in the near future) are not explicitly stated, which could hinder further industrial development.

EC P21	Support the infrastructural renewal and development of the gas networks in the county, subject to proper planning, heritage, environmental and amenity requirements.

Policy ECP21 of the *Draft Kildare County Development Plan 2023-2029* supports the continued use and development of gas networks. This policy does not speak to the further development of the conventional gas fired ancillary energy facilities that are necessary for further industrial development.

4.0 THE CASE FOR CARBON CREDITS

Any auto-generation on industrial sites must be aware of the environmental effect of carbon emissions in the context of Climate Change, and the need to transition to a low-carbon economy. An internationally accepted way to do this is to provide a 100% offset to carbon emissions caused by ancillary auto-generation using domestic and international certified Carbon Credits. This 100% offset of carbon emissions would make further industrial developments effectively carbon neutral.

This approach allows continued industrial development to be carbon-neutral while also delivering associated economic and community benefits, all at no further strain to the National Electricity Grid.

Carbon credits are an internationally recognised approach to controlling and offsetting the emission of Greenhouse gases. A carbon credit represents a tradeable permit to emit a stated tonnage of a Greenhouse gas, which must be acquired by the operators of emission producing facilities.

Carbon Credits can reduce emissions through two main mechanisms. Firstly, the attributing of a cost to the emission of a certain volume of Greenhouse gases creates an economic incentive for emitters to either increase the efficiency of their emitting operations, or to transition to a lesser emitting power source and thus avoid the cost of acquiring carbon credits. Secondly, the purchase of certain Carbon Credits can offset the emissions by the purchasing operator. Since the introduction of the Clean Development Mechanism (CDM) under the Kyoto Protocol, an international framework exists whereby low-carbon projects such as Windfarms, etc., would generate Carbon Credits for sale. Hence, the purchasing of Carbon Credits by emitters would fund the development of renewable energy schemes elsewhere, whether in the same jurisdiction or another country (frequently in the developing world).

Existing Carbon Credit schemes have proven successful in recent decades. The European Union's Emissions Trading System (ETS), which covers carbon emission arising from the production of energy, has resulted in a 35% reduction in emissions by covered installations between 2005 and 2019.

Further industrial development could 100% offset the emissions arising from ancillary energy production on site through the purchase of Carbon Credits which would fund emission-reducing projects elsewhere.

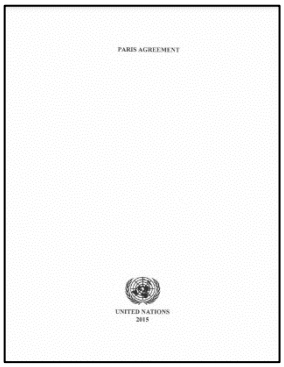
Although the development of Greenhouse gas emitting ancillary energy facilities on the site would increase emissions locally, the effect of emissions on the climate is a global phenomenon not restricted to any national border. The purchase of offsetting Carbon Credits for the proposed ancillary energy facilities would lead to the development of emission-reducing projects elsewhere that would reduce the global total of emissions in line with those created as part of any further industrial development.

By offsetting 100% of the emissions generated by further industrial development through Carbon Credits, the global level of Greenhouse gas emissions would remain unchanged or be reduced through the development of renewable energy schemes elsewhere

Any further industrial development using this approach would thus be carbon-neutral in terms of energy usage

The importance of emission offsetting Carbon Credits is recognised in both international and national policy:

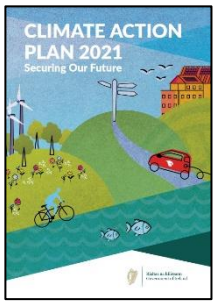
The 2015 *Paris Agreement* (a legally binding international agreement on Climate Change) supports the use of market-based emissions trading mechanisms to achieve carbon reductions. The objective of such a mechanism is set out in Article 6 of the agreement:



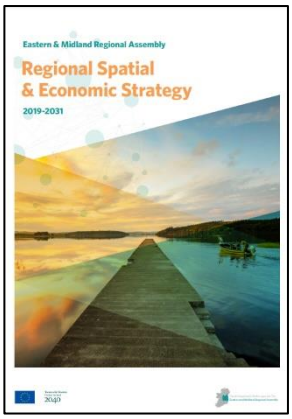
> '*4. A mechanism to contribute to the mitigation of greenhouse gas emissions and support sustainable development is hereby established under the authority and guidance of the Conference of the Parties serving as the meeting of the Parties to this Agreement for use by Parties on a voluntary basis. It shall be supervised by a body designated by the Conference of the Parties serving as the meeting of the Parties to this Agreement, and shall aim:*
>
> *(a) To promote the mitigation of greenhouse gas emissions while fostering sustainable development;*
>
> *(b) To incentivize and facilitate participation in the mitigation of greenhouse gas emissions by public and private entities authorized by a Party;*
>
> *(c) To contribute to the reduction of emission levels in the host Party, which will benefit from mitigation activities resulting in emission reductions that can also be used by another Party to fulfil its nationally determined contribution; and*
>
> *(d)* ***To deliver an overall mitigation in global emissions.***' (Our emphasis.)

This section was strengthened for operationalisation as part of the outcomes arising from the *COP26* United Nations Framework Convention on Climate Change (UNFCCC), Conference of Parties, Glasgow 2021.

The European Union state that the continued operation of the ETS will form part of the EU's contribution towards meeting carbon reductions in line with commitments made in the 2015 *Paris Agreement*. In 2021, EU legislative proposals to bring policies into line with emission reduction targets set out in the *2019 European Green Deal* included '*increasing the ambition'* of the EU ETS by including additional sectors such as maritime and road construction emissions.



At a national level, Section 12.3.1 of the Department of the Environment, Climate and Communications' *Climate Action Plan 2021* (as updated in May 2022) sets out continued support to with EU partners to ensure that use of the EU ETS continues to deliver emission reductions as part of the revised objectives of the "Fit for 55" package, which aims for a 55% reduction in emissions compared to 1990 levels.



Section 7.8 of the Eastern & Midland Assembly's *Regional Spatial and Economic Strategy 2019-2031* also indicates support for the development of domestic based carbon credit schemes based on peatland regeneration.

Is this international and national outlook on Carbon Credits represented in the *Draft Kildare County Development Plan 2023-2029*?

There is no mention of Carbon Credits, or equivalent terms, in the Draft Kildare County Development Plan 2023-2029

Section 7.2 of the Draft Plan states that regard has been had to the following documents:

- *'EU Renewable Energy Directive 2009/28/EU*
- *2030 EU Climate and Energy Framework 2014*
- *EU Effort Sharing Regulations 2018*
- *EU Directive 2001/77/EC Renewable Energy*
- *EU Directive on the Energy Performance of Buildings (2002/91/EC)*
- ***The Paris Agreement 2015***
- ***The United Nations Framework Convention on Climate Change (UNFCCC), Conference of Parties, Glasgow 2021.***
- ***EU Commission European Green Deal 2019.***
- *Project Ireland 2040 National Planning Framework*
- *National Development Plan 2018-2027*
- ***Regional Spatial and Economic Strategy 2019***
- *Energy White Paper Ireland's Transition to a Low Carbon Energy Future 2015 - 2030*
- *The National Climate Change Adaptation Framework Plan 2018*
- *The Climate Action and Low Carbon Development Acts 2015 to 2021*

- *National Peatlands Strategy 2015*
- *Kildare Climate Change Adaptation Strategy'* (Our emphasis)

Although it is stated that regard has been had to several international and national binding policy documents that support emission offsetting Carbon Credits, the *Draft Plan* does not mention such mechanisms.

Furthermore, the *Draft Plan* does not state here that regard has been had to the Department of the Environment, Climate and Communications' *Climate Action Plan 2021.*

The international consensus on the utility of Carbon Credit systems in reducing carbon emissions, and the mention of such in international and national policy documents, warrants the explicit referral to, and support for, the use of emission offsetting Carbon Credits in the *Draft Kildare County Development Plan 2023-2029*

4.1 THE NECESSITY FOR AMENDMENTS TO POLICIES IN THE *DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-2029*

In Summary:

Ambiguities regarding Kildare County Council's view on:

- **the further development of conventional Natural Gas ancillary energy generation;**
- **The use of Carbon Credits as an environmentally friendly way to lower emissions;**
- **Oversights in the definition of what constitutes Renewable Energy;**

combine to pose considerable risk to the delivery of further industrial development and the accompanying economic and community benefits

5.0 PROPOSED AMENDMENTS TO THE DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-2029

To facilitate further industrial development, we request the following amendments to the *Draft Plan*.

Policies relevant to the above discussion of an energy crisis constraining further industrial development have been selected for amendment. Excerpts from the stated Policies, Objectives, and text of the Draft Plan are given below as they currently appear for public consultation. Each individual item has listed underneath a suggested version of the Policy, Objective or text as amended, with the altered or additional text given in red. Actions, such as the addition of an entirely new policy, will be given in bold.

5.1 PROPOSED AMENDMENTS TO CHAPTER 1: INTRODUCTION & STRATEGIC CONTEXT

Section 1.5 '*Climate Change*' includes the following text:

> '*This Plan is set in a context where climate change is accepted as a global challenge and requires climate action responses in adaptation and mitigation to ensure a healthy, economically thriving, liveable built environment. The Government has adopted the Climate Action and Low Carbon Development (Amendment) Act 2021 which provides for the approval of plans by the Government for the purpose of pursuing the transition to a climate resilient, biodiversity rich and climate neutral economy by no later than the end of the year 2050. These plans will provide for carbon budgets and sectoral emissions and ceilings to different sectors of the Irish economy.*'

The following amendment to this text is suggested:

> '*This Plan is set in a context where climate change is accepted as a global challenge and requires climate action responses in adaptation and mitigation to ensure a healthy, economically thriving, liveable built environment. The Government has adopted the Climate Action and Low Carbon Development (Amendment) Act 2021 which provides for the approval of plans by the Government for the purpose of pursuing the transition to a climate resilient, biodiversity rich and climate neutral economy by no later than the end of the year 2050. These plans will provide for carbon budgets (including the use of Carbon Credits) and sectoral emissions and ceilings to different sectors of the Irish economy.*'

Section 1.8 '*Overarching Guiding Principles*' includes the following text:

> '(*i) To develop a county that is resilient to climate change, plans for and adapts to climate change and flood risk, facilitates a low carbon future, supports energy efficiency and conservation and enables the decarbonisation of our lifestyles and economy'*

The following amendment to this text is suggested:

> '(*i) To develop a county that is resilient to climate change, plans for and adapts to climate change and flood risk, facilitates a low carbon future through a range of measures including the use of Carbon Credits, supports energy efficiency and conservation and enables the decarbonisation of our lifestyles and economy'*

5.2 PROPOSED AMENDMENTS TO CHAPTER 2: CORE STRATEGY & SETTLEMENT STRATEGY

Section 2.15.3 'Self Sustaining Growth Towns' includes the following text:

> '*The self-sustaining growth towns of Newbridge, Leixlip, Kildare Town and Athy will continue to attract a moderate level of jobs and services through a range of employment types including biotechnology, ICT, high-tech manufacturing and research, bloodstock, tourism and food and beverage products.*'

The following amendment to this text is suggested:

> '*The self-sustaining growth towns of Newbridge, Leixlip, Kildare Town and Athy will continue to attract a moderate level of jobs and services through a range of employment types including biotechnology, ICT, high-tech manufacturing and research, bloodstock, tourism, food beverage products and ancillary sustainable energy provision.*'

Core Strategy Objective CSO 1.2 states:

CSO 1.2	Ensure that the future growth and spatial development of County Kildare provides for a county that is resilient to climate change, enables the decarbonisation of the county's economy and reduces the county's carbon footprint in support of national targets for climate mitigation and adaption objectives as well as targets for greenhouse gas emissions reductions.

The following amendment to this Objective is suggested:

> '*Ensure that the future growth and spatial development of County Kildare provides for a county that is resilient to climate change, enables the decarbonisation of the county's economy and reduces the county's carbon footprint (including through the use of Carbon Credits) in support of national targets for climate mitigation and adaption objectives as well as targets for greenhouse gas emissions reductions.*'

5.3 PROPOSED AMENDMENTS TO CHAPTER 4: RESILIENT ECONOMY & JOB CREATION

Section 4.2 'Economic Development & Climate Action' includes the following text:

> '*The source of Greenhouse Gases (GHGs) from the industrial and commercial sectors is essentially from the activities and processes used in the manufacturing industries. These include combustion emissions from industrial and commercial activities, including processes used in food and drinks production. Fossil fuels are also used for the heating and cooling of industrial and commercial buildings. Energy efficient gains are achievable in this sector through innovative design, low-carbon technology, use of Combined Heat and Power (CHP) and roll out of district heating and other renewable energy projects. In addition, sustainable development requires that our economic strategy is resilient, adaptable and innovative.'*

The following amendment to this text is suggested:

> *'The source of Greenhouse Gases (GHGs) from the industrial and commercial sectors is essentially from the activities and processes used in the manufacturing industries.*

These include combustion emissions from industrial and commercial activities, including processes used in food and drinks production. Fossil fuels are also used for the heating and cooling, and powering, of industrial and commercial buildings, which can be offset through the use of Carbon Credits. Energy efficient gains are achievable in this sector through innovative design, low-carbon technology, use of Combined Heat and Power (CHP) and roll out of district heating and other renewable energy projects. In addition, sustainable development requires that our economic strategy is resilient, adaptable and innovative.'

Resilient Economy Objective RE O6 states:

RE O6	Support enterprises and industry, including employment-intensive international business and technology parks, small and medium enterprises (SME) and micro enterprise centres at appropriate locations throughout the county.

The following amendment to this Objective is suggested:

'*Support enterprises and industry, including employment-intensive international business, technology and ICT parks, small and medium enterprises (SME), micro enterprise centres and any necessary ancillary sustainable energy infrastructure at appropriate locations throughout the county.*'

Section 4.4 '*Economic Development Hierarchy*' includes the following table:

Hierarchy	Description	Locations	Sectoral Opportunities
Strategic Development Areas in the MASP[1]	Leixlip – Former Hewlett Packard site and Collinstown site to strengthen	North-West Corridor – (Maynooth/ Dunboyne commuter line /DART)	Business Parks comprising knowledge-based economy focusing on high tech/biotechnology, research and development, ICT and manufacturing. Research and Technology
	employment base for North Kildare. Maynooth – New Research & Technology Park adjoining Maynooth University.		

The following amendment to the Sectoral Opportunities column of this table is suggested:

'*Business Parks comprising knowledge-based economy focusing on high tech/biotechnology, research and development, ICT, manufacturing and ancillary sustainable energy provision.*

Research and Technology'

Resilient Economy Objective RE O23 states:

RE O23	Continue to support and develop the Self-Sustaining Growth Towns of Newbridge and Leixlip as an attractor but not limited to Biotechnology, ICT, professional services, High-tech manufacturing and research employment. Kildare County Council will work with Irish Water and other agencies to ensure the delivery of key infrastructure to facilitate future development

The following amendment to this Objective is suggested:

'*Continue to support and develop the Self-Sustaining Growth Towns of Newbridge and Leixlip as an attractor but not limited to Biotechnology, ICT, professional services, High-tech manufacturing, research employment and ancillary sustainable energy provision. Kildare County Council will work with Irish Water and other agencies to ensure the delivery of key infrastructure to facilitate future development'*

Resilient Energy Objective RE O49 states the following:

RE O49	Continue to develop North Kildare as a digital economic hub by building on an existing critical mass in the IT and digital sector and attracting further significant investment to further develop the sector to its maximum potential.

The following amendment to this Objective is suggested:

'*Continue to develop North Kildare as a digital economic hub by building on an existing critical mass in the IT and digital sector and attracting further significant investment and necessary ancillary sustainable energy infrastructure to further develop the sector to its maximum potential.*'

Resilient Economy Objective RE O53 states:

RE O53	Support existing FDI large industrial companies in sustaining and expanding their businesses at appropriate locations

The following amendment to this Objective is suggested:

'*Support existing FDI large industrial companies in sustaining and expanding their businesses at appropriate locations, including facilitating the provision of necessary ancillary sustainable energy infrastructure*'

Resilient Economy Objective RE O70 states:

RE O70	Require data centres to consider the use of sustainable renewable sources of energy to fuel their operations in whole in the first instance or in part where this is not possible and where it has been satisfactorily demonstrated not to be possible.

The following amendment to this Objective is suggested:

> ''*Require data centres to consider the use of sustainable renewable sources of energy to fuel their operations in whole in the first instance. Where this has been demonstrated not to be possible, consider the use of renewable sources of energy in part and/or the use of carbon credits to offset carbon emissions.*'

Resilient Economy Objective RE O73 states:

RE O73	Promote net zero-carbon and carbon reduction in economic development through innovative design, low-carbon technology, use of Combined Heat and Power (CHP) and roll out of district heating and other renewable energy projects. All these actions are outlined within the National Climate Action Plan.

The following amendment to this Objective is suggested:

> '*Promote net zero-carbon and carbon reduction in economic development through innovative design, low-carbon technology, Emissions Trading, use of Combined Heat and Power (CHP) and roll out of district heating and other renewable energy projects. All these actions are outlined within the National Climate Action Plan.*'

5.4 PROPOSED AMENDMENTS TO CHAPTER 7: ENERGY & COMMUNICATIONS

Section 7.2 '*Planning Policy Context*' states that regard has been had to the following documents:

- *'EU Renewable Energy Directive 2009/28/EU*
- *2030 EU Climate and Energy Framework 2014*
- *EU Effort Sharing Regulations 2018*
- *EU Directive 2001/77/EC Renewable Energy*
- *EU Directive on the Energy Performance of Buildings (2002/91/EC)*
- *The Paris Agreement 2015*
- *The United Nations Framework Convention on Climate Change (UNFCCC), Conference of Parties, Glasgow 2021.*
- *EU Commission European Green Deal 2019.*
- *Project Ireland 2040 National Planning Framework*
- *National Development Plan 2018-2027*
- *Regional Spatial and Economic Strategy 2019*

- *Energy White Paper Ireland's Transition to a Low Carbon Energy Future 2015 - 2030*
- *The National Climate Change Adaptation Framework Plan 2018*
- *The Climate Action and Low Carbon Development Acts 2015 to 2021*
- *National Peatlands Strategy 2015*
- *Kildare Climate Change Adaptation Strategy'*

It is suggested that regard is also given to the Department of the Environment, Climate and Communications' *Climate Action Plan 2021* and that this document is added to this list so that it reads:

- *'EU Renewable Energy Directive 2009/28/EU*
- *2030 EU Climate and Energy Framework 2014*
- *EU Effort Sharing Regulations 2018*
- *EU Directive 2001/77/EC Renewable Energy*
- *EU Directive on the Energy Performance of Buildings (2002/91/EC)*
- *The Paris Agreement 2015*
- *The United Nations Framework Convention on Climate Change (UNFCCC), Conference of Parties, Glasgow 2021.*
- *EU Commission European Green Deal 2019.*
- *Project Ireland 2040 National Planning Framework*
- *National Development Plan 2018-2027*
- *Regional Spatial and Economic Strategy 2019*
- *Energy White Paper Ireland's Transition to a Low Carbon Energy Future 2015 - 2030*
- *The National Climate Change Adaptation Framework Plan 2018*
- *The Climate Action and Low Carbon Development Acts 2015 to 2021*
- *Climate Action Plan 2021*
- *National Peatlands Strategy 2015*
- *Kildare Climate Change Adaptation Strategy'*

Section 7.4 '*Renewable Energy*' includes the following text:

> '*Under EU Directive 2001/77/EC Renewable Energy, renewable energy sources are defined as renewable non-fossil energy sources such as, but not limited to wind, solar, geothermal, wave, tidal, hydropower, bioenergy, landfill gas, sewage treatment plant gas, biogases and bio-char (i.e. the thermal treatment of natural organic materials in an oxygen-limited environment).*
>
> *Due to increased energy requirements and national and EU targets for energy consumption from renewable sources, our electricity supply must move away from fossil fuel sources to renewable and sustainable forms of generation. The Council recognises the range of new and developing technologies and supporting infrastructure that can contribute to minimising greenhouse gas emissions and to securing a greater proportion of our energy needs from renewable resources.*'

The following amendment to this text is suggested:

> '*Under EU Directive 2001/77/EC Renewable Energy, renewable energy sources are defined as renewable non-fossil energy sources such as, but not limited to wind, solar, geothermal, wave, tidal, hydropower, bioenergy, landfill gas, sewage treatment plant gas, biogases and bio-char (i.e. the thermal treatment of natural organic materials in an oxygen-limited environment). Recognising the potential of emission-offsetting Carbon Credits to reduce global carbon emissions, energy generation projects that are 100% offset in this manner will be included in the definition of 'Renewable Energy' with regard to the policies, objectives and actions outlined in the Kildare County Development Plan 2023-2029.*
>
> *Due to increased energy requirements and national and EU targets for energy consumption from renewable sources, our electricity supply must move away from fossil fuel sources to renewable and sustainable forms of generation. The Council recognises the range of new and developing technologies and supporting infrastructure that can contribute to minimising greenhouse gas emissions and to securing a greater proportion of our energy needs from renewable resources, including the use of emission-offsetting Carbon Credits.*'

Energy and Communications Objective EC O1 states:

EC O1	Ensure that energy intensive sectors incorporate significant renewable energy sources to reduce their carbon footprint.

The following amendment to this Objective is suggested:

> '*Ensure that energy intensive sectors incorporate significant renewable energy sources, or make use of appropriate carbon credits, to reduce their carbon footprint.*'

Energy and Communications Objective EC O3 states:

EC O3	Support initiatives for limiting emissions of greenhouse gases through energy efficiency and the development of renewable energy sources which make use of the natural resources in an environmentally and socially acceptable manner.

The following amendment to this Objective is suggested:

> '*Support initiatives for limiting emissions of greenhouse gases through energy efficiency, the use of carbon credits, and the development of renewable energy sources which make use of the natural resources in an environmentally and socially acceptable manner.*'

Energy and Communications Objective EC O5 states:

EC O5	Support and encourage the sustainable development of renewable energy auto production units (the production of energy primarily for on-site usage) for existing and proposed developments in line with relevant design criteria, amenity and heritage considerations and the proper planning and sustainable development of the area.

The following amendment to this Objective is suggested:

> '*Support and encourage the sustainable development of renewable (or carbon credit offset) energy auto production units (the production of energy primarily for on-site usage) for existing and proposed developments in line with relevant design criteria, amenity and heritage considerations and the proper planning and sustainable development of the area.*'

We further suggest the addition of a new Objective in this Chapter with the following wording:

> *'Support and encourage the use of renewable energy and/or carbon credits by commercial and industrial developments to offset carbon emissions.'*

Energy and Communications Policy EC P14 states:

EC P14	Require high levels of energy conservation, energy efficiency and the use of sustainable and renewable energy sources in new and existing buildings.

The following amendment to this Policy is suggested:

> '*Require high levels of energy conservation, energy efficiency and the use of sustainable and renewable energy sources (including the use of Carbon Credits) in new and existing buildings.*'

Energy and Communications Objective EC O44 states:

EC O44	Require all new development to be designed to take account of the impacts of climate change, and that energy conservation, energy efficiency and energy renewable measures are incorporated in new and existing buildings through the appropriate design and location of new development, in accordance with relevant building regulations and guidelines.

The following amendment to this Objective is suggested:

> 'Require all new development to be designed to take account of the impacts of climate change, and that energy conservation, energy efficiency and energy renewable measures (including the use of Carbon Credits) are incorporated in new and existing buildings through the appropriate design and location of new development, in accordance with relevant building regulations and guidelines.'

Energy and Communications Objective EC O57 states:

EC O57	Consider applications for data centres having regard to the following criteria: • Accessibility/ease of connection to power • Availability of renewable energy to power any proposed data centre • Availability of high-powered fibre optic infrastructure • Transport/road accessibility
	• Compatibility of surrounding land uses/zoning • Avoidance of designated sites • Availability of significant landbanks • Noise • Visual impact • Flood risk

The following amendment to this Objective is suggested:

> '*Consider applications for data centres having regard to the following criteria:*
> - *Accessibility/ease of connection to power*
> - *Availability of renewable energy to power, or Carbon Credits to offset emissions for, any proposed data centre*
> - *Availability of high-powered fibre optic infrastructure*
> - *Transport/road accessibility*
> - *Compatibility of surrounding land uses/zoning*
> - *Avoidance of designated sites*
> - *Availability of significant landbanks*
> - *Noise*
> - *Visual impact*
> - *Flood risk'*

Energy and Communications Objective EC O59 states:

EC O59	Require data centres to consider the use of renewable and sustainable sources of energy to fuel their operations in whole in the first instance or in part where this is not possible and where it has been satisfactorily demonstrated not to be possible.

The following amendment to this Objective is suggested:

> '*Require data centres to consider the use of renewable and sustainable sources of energy to fuel their operations in whole in the first instance. Where this has been demonstrated not to be possible, consider the use of renewable sources of energy in part and/or the use of carbon credits to offset carbon emissions.*'

Energy and Communications Objective EC O63 states:

EC O63	Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/distribution of a renewable energy focused generation.

The following amendment to this Objective is suggested:

> '*Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/distribution of a renewable energy (including the use of carbon credits) focused generation.*'

5.5 PROPOSED AMENDMENTS TO CHAPTER 15: DEVELOPMENT STANDARDS

Section 15.9.2 '*Industry and Warehousing Development*' includes the following text:

> '*Industry and warehousing schemes will be required to present a good quality appearance, helped by landscaping and careful placing of advertisement structures. In relation to industrial development the following should be taken into consideration:*
>
> • *Individual buildings should exhibit a high quality of modern architectural design and finish (including the use of colour);*
>
> • *In the case of two or more industrial / warehouse units, a uniform design is required for boundary treatments, roof profiles and building lines;*
>
> • *Areas between the building and road boundary may include car parking spaces provided adequate screen planting is incorporated into the design proposal;*
>
> • *Adequate provision shall be made on the site for parking of vehicles, storage and stacking space. Storage and stacking areas shall be located to the rear of the building or, where such facilities are located at the side, provision for screening shall be made;*
>
> • *The building line from adjoining land-uses will be determined at Local Area Plan level having regard to the nature of uses and site-specific matters, or in accordance with Section 15.7.7 of this Plan;*

• The front building line shall be as determined in consultation with the planning authority and, where required, the existing roadside boundary shall be set back;

• Any industrial or commercial development shall not be injurious to the residential amenity of adjoining properties;

• A landscaping plan shall be included with any planning application which details landscaped areas to the front of the building line and the provision of a buffer zone (minimum 5-10 metres) where the development adjoins another zoning or where it would impact on the amenities of adjoining land uses;

• Proposals shall be submitted to incorporate Sustainable urban Drainage Systems (SuDS) and other nature-based surface water drainage solutions as part of all plans and development proposals. Priority shall be given to SuDS that incorporate green infrastructure and promote biodiversity including green roofs, walls and rain gardens, with underground retention solutions only being considered when all other options have been exhausted.

• Other measures that address climate change shall include the encouragement and support of solar and wind energy as part of any proposals.'

The following amendment to this text is suggest:

'Industry and warehousing schemes will be required to present a good quality appearance, helped by landscaping and careful placing of advertisement structures. In relation to industrial development the following should be taken into consideration:

• Individual buildings should exhibit a high quality of modern architectural design and finish (including the use of colour);

• In the case of two or more industrial / warehouse units, a uniform design is required for boundary treatments, roof profiles and building lines;

• Areas between the building and road boundary may include car parking spaces provided adequate screen planting is incorporated into the design proposal;

• Adequate provision shall be made on the site for parking of vehicles, storage and stacking space. Storage and stacking areas shall be located to the rear of the building or, where such facilities are located at the side, provision for screening shall be made;

• The building line from adjoining land-uses will be determined at Local Area Plan level having regard to the nature of uses and site-specific matters, or in accordance with Section 15.7.7 of this Plan;

• The front building line shall be as determined in consultation with the planning authority and, where required, the existing roadside boundary shall be set back;

• Any industrial or commercial development shall not be injurious to the residential amenity of adjoining properties;

• A landscaping plan shall be included with any planning application which details landscaped areas to the front of the building line and the provision of a buffer zone

(minimum 5-10 metres) where the development adjoins another zoning or where it would impact on the amenities of adjoining land uses;

• Proposals shall be submitted to incorporate Sustainable urban Drainage Systems (SuDS) and other nature-based surface water drainage solutions as part of all plans and development proposals. Priority shall be given to SuDS that incorporate green infrastructure and promote biodiversity including green roofs, walls and rain gardens, with underground retention solutions only being considered when all other options have been exhausted.

• Other measures that address climate change shall include the encouragement and support of solar and wind energy and/or the use of emission offsetting Carbon Credits *as part of any proposals.'*

Section 15.9.3.2 '*Energy Efficiency and Climate Change Adaption Design Statement (Industry, Warehousing, Business and Technology Parks)*' includes the following text:

'*Development proposals for Industrial, Warehousing, Business and Technology Park developments in excess of 1,000 m² of commercial floor space should be accompanied by an Energy Efficiency and Climate Change Adaptation Design Statement.*

The statement should detail how any on-site demolition, construction and long-term management of the development will be catered for and how energy and climate change adaptation considerations have been inherently addressed in the design and planning of the scheme.

Such developments shall have regard to;

• the requirements of the current Building Regulations Part L – Conservation of Fuel and Energy (2008 and 2011), and any other supplementary or superseding Regulations or guidance documents.

• the DECLG guidance document 'Towards nearly Zero Energy Buildings in Ireland - Planning for 2020 and Beyond', which promotes the increase of near Zero Energy Buildings (nZEB).

New development proposals shall show how energy efficiency is achieved through siting, layout, design and incorporate best practice in energy technologies, conservation and smart technology.

The author of an Energy Efficiency and Climate Change Adaptation Design Statement should be appropriately qualified or competent and shall provide details of their qualifications and experience along with the statement.'

The following amendment to this text is suggested:

'*Development proposals for Industrial, Warehousing, Business and Technology Park developments in excess of 1,000 m² of commercial floor space should be accompanied by an Energy Efficiency and Climate Change Adaptation Design Statement.*

The statement should detail how any on-site demolition, construction and long-term management of the development will be catered for and how energy and climate change adaptation considerations have been inherently addressed in the design and planning of the scheme, for example the use of emission offsetting Carbon Credits.

Such developments shall have regard to;

• the requirements of the current Building Regulations Part L – Conservation of Fuel and Energy (2008 and 2011), and any other supplementary or superseding Regulations or guidance documents.

• the DECLG guidance document 'Towards nearly Zero Energy Buildings in Ireland - Planning for 2020 and Beyond', which promotes the increase of near Zero Energy Buildings (nZEB).

New development proposals shall show how energy efficiency is achieved through siting, layout, design and incorporate best practice in energy technologies, conservation and smart technology.

The author of an Energy Efficiency and Climate Change Adaptation Design Statement should be appropriately qualified or competent and shall provide details of their qualifications and experience along with the statement.'

6.0 SUGGESTED AMENDMENTS TO THE DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-2029

It is respectfully requested that the above suggested amendments to the *Draft Kildare County Development Plan 2023-2029*, as proposed by Tom Phillips + Associates and Davy Platform ICAV (Ireland), and the key issues made are duly considered by the Council in making the *Draft Kildare County Development Plan 2023-2029*.

Yours sincerely,

Gavin Lawlor
Director
Tom Phillips + Associates