



Climate Division – Carbon Budgets
Department of the Environment, Climate and Communications
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A Chairde,

This submission seeks to support progress on regulating carbon budgets and to address the need for spatial planning to be considered in the process.

With the signing into law of the Climate Action and Low Carbon Development (Amendment) Act 2021, forward planning within the context of Carbon Budgets needs to be considered. The regulation to be adopted should clarify the treatment of accounting of greenhouse gas emissions and removals in the land-use sector, thus providing a clear and solid foundation for the carbon budget proposals.

While the Strategic Environmental Assessments are completed during land-use plan-making, guidelines on the making of development plans do not set out clear methods on the assessment of GHG emissions/removals that arise from strategy or policy choices.

Planning Authorities, at national, regional and local levels lack a framework to quantify emissions related to forward planning or development management.

I refer you to the work of the Eastern and Midland Regional Assembly. The Regional Spatial and Economic Strategy 2019-2031 includes Regional Policy Objectives to coordinate meaningful responses to Climate Action. One of the three key cross-cutting principles that underpin the RSES is:

“The need to enhance climate resilience and to accelerate a transition to a low carbon society recognising the role of natural capital and ecosystem services in achieving this.”

The RSES recognises the need for the Assessment of Proposals for Greenhouse Gas Emissions (GHGs). At the adoption of the RSES in 2019, the intention was not to render approval of land use designation or transport infrastructure, conditional on consistency with GHG emissions reductions targets in the absence of an agreed methodology at the national level. As an interim step, the RSES supports the development of a methodology to assess the impact of city and county development plan strategies on carbon reduction targets.

Regional Policy Objectives were set out as follows:

RPO 3.4: Ensure that all plans, projects and activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate. In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.

RPO 3.5: Identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.

RPO 3.6: City and county development plans shall undergo assessment of their impact on carbon reduction targets and shall include measures to monitor and review progress towards carbon reduction targets.

While national guidance is awaited, EMRA engaged with ESPON and regional partners. The collaboration was developed through the Environmental Conference of the Regions of Europe.

The project, "Quantitative Greenhouse Gas Impact Assessment Method for Spatial Planning Policy" (QGasSP) is aimed at researching the development and delivery of a robust, simple and proportionate method for quantifying and forecasting the relative GHG impacts of alternative spatial planning policies, with pan-European applicability.

The output will be a user-friendly web application/tool to use in modelling GHG emissions from different spatial plans and to inform decision-making processes, including Strategic Environmental Assessment (SEA).

The Q4 2021 update to members of the Assembly reads:

- Draft Final Report and Pilot Case Study reports were received by the stakeholders in late October 2021.
- A workshop for internal Stakeholders was held on 10 November 2021 to demonstrate the future functionalities of the project output which will be this new GHG quantification tool called the **Greenhouse Gas Impact Assessment (GGIA)** tool.
- The project Steering Committee met on 23 November 2021 to discuss the finalisation of the report and the tool. Following some delays adapting the output user interface the project period was extended until April 2022.
- Of note, public engagement was developed during ESPON Week, 29 November to 2 December 2021. EMRA participated in a workshop discussing QGasSP that focused on the 'planner user' of the new tool and explained the detailed methodology behind the tool.
- EMRA continue to engage with TalTech (the service provider) on the finalisation of the tool, with a steering committee meeting to follow.

Details of the progress are published on the project website:

<https://www.espon.eu/QGasSP>

The Interim Report (June 2021) summarises the methodology and model development, case study pilots of baseline analysis for Rathlin Island and County Meath, the city of Edinburgh in Scotland and the Kymenlaakso Region in Finland.

Of note, the report addresses the role of the SEA process and how this contrasts with the proposed use of the anticipated GGIA tool.

"According to the SEA Directive (2001/42/EC) (European Commission, 2001), the main role of SEA is to avoid and reduce environmental impacts arising from the implementation of a spatial or sectoral plan or programme. SEA provides alternative scenarios for public debate and the best environmental options for decision-makers of the strategic documents. SEA report is usually a supplementary document to the strategic document, justifying the choice of the best environmental option.

While the SEA reports of pilot area cases do not provide quantifiable data for the emissions calculations, they still provide important background information about the future plans of the pilot area cases in terms of the changes in emissions arising from buildings, transport and land-use change. The SEA reports will be attached to the model as an additional source of information."

In line with the Climate Action and Low Carbon Development (Amendment) Act 2021, planning and transport authorities, among other service providers are required, in so far as practicable, to perform their 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 mitigating greenhouse gas emissions and adapting to the effects of climate change.