

# Submission to Draft Nenagh Local Area Plan 2024-2030

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The following are some comments and suggestions on the Draft Nenagh Local Area Plan 2024-2030 as pertain to energy (energy planning, energy efficiency and renewables).

I will mention these in the order that they come up on the plan document, but first a couple of general comments.

To begin, it goes without saying that this is an excellently produced plan, in terms of the text, writing, maps etc, however, the actual language in several of the references is too vague, and contain no measurable indicators. This is the most serious flaw in the LAP.

In Section 2.3 A Framework for Investment, page 20, there is a reference to Climate Action fund, which states that this fund supports capacity building. As it stands, this is not the case.

SEC who have inquired about this fund, have been told that capacity building, and community costs in development community energy projects will not be funded.

“Climate Action Fund To aid and provide financial support to projects to help Ireland achieve climate and energy targets. At least €500m in government funding up to 2027 will be provided for specific sectors (such as electricity, transport, heat or agriculture) or specific areas (such as capacity building, innovation, or community participation)”

The references to new housing developments being “compact, near zero energy rated” is a positive one, as is Policy 2.3, Page 26 that new developments should “incorporate best practice in low-carbon and energy efficient planning and techniques as reflected by the policies and objectives of the TCDP and this LAP and in accordance with the forthcoming Climate Action Plan for Tipperary 2023 (and any review thereof).”

However, apart from these, this Local Area Plan contains no specific measurable objectives relating to energy efficiency or renewable energy.

With out SMART goals, this plan is effectively a plan without aims or ambitions or commitments.

## 5 Sustainable Communities

Page 27, Objective 2G mentions engaging “with the Tipperary Energy Agency, and other relevant energy agencies, to develop targeted energy and climate action measures within the geographic area of the local area plan.” This is good. But is it not possible for the local government to itself set targets, and participate in energy developments? For what reason is the local government so risk averse, and balking at the responsibility to develop local energy initiatives, either itself or in partnership.

Again, Objective 2A mentions “supporting the local community to identify and implement measures and actions to reduce energy consumption, produce renewable energy from local resources and to adapt to a changing climate, in accordance with the Tipperary Climate Action Plan 2023 (when complete).

Why passing the buck to unpaid community and voluntary actors? Why is not the local government here in it’s plan, setting out its stall for what it is going to do, in a specific measurable way?

Page 43 mentions that “at the local level in Nenagh, through the provisions of the current Climate Action Plan and Delivering Climate Action 2030 (CCMA, 2021), the Council will seek to support the local community and relevant sectors in engaging in programmes such as ‘the SEAI Sustainable Energy Community’ (SEC) programme<sup>12</sup>, sectoral adaptation plans and sustainable energy and climate action initiatives.”

This is very positive, however, again what does “support” mean? Who will do the supporting? What will the support be? How many? How much?

This paragraph goes on to mention that “ The North Tipperary Development Company and Energy Communities Tipperary Co-operative are Nenagh based organisations and both are active in facilitating and supporting local communities in development sustainable energy, home retrofits and supporting district heating feasibility studies.” This paragraph should mention the local Sustainable Energy Communities mentor who SEAI engages to support local communities that wish to develop energy projects. A website reference should also be included: [www.Seai.ie/sec](http://www.Seai.ie/sec)

Page 52, under Planning and Development Objective 5A states that the council will “Support the local community and relevant sectors in engaging in programmes such as ‘the SEAI Sustainable Energy Community’ through the provisions of the Tipperary Climate Action Plan and Delivering Climate Action 2030 (CCMA, 2021). In preparing sectoral adaptation plans and sustainable energy and climate action initiatives, including in the preparation of an Energy Master Plan and in the identification and use of local renewable energy sources.”

Again here there are no specifics or measurable indicators on what this support will entail.

“Preparing sectoral adaptation plans and sustainable energy and climate action initiatives, including in the preparation of an Energy Master Plan and in the identification and use of local renewable energy sources” is only the role of unpaid community volunteers. The local government and the municipal district should spell out what it is it wants to do, and what its role in local Energy planning will be.

## 8 Infrastructure Energy and Utilities

On page 68, there is similar progress paragraph on how “the Council and its stakeholders will support the transition to renewable energy for heating and transport, and will encourage and support the transition to renewable energy generated locally in tandem with the energy efficiency upgrading of built fabric throughout the town. The Council recognises the role of domestic scale renewables and appropriately scaled renewable energy development in meeting local demand and supports the principle of on-site energy generation for self-consumption.”

However, the related Planning and Development Policy 8.1, (Page 73) merely states “it is the policy of the Council to “Support the use of renewable energy technologies at appropriate scales in residential, commercial and community developments and support the principle of on-site energy generation for self-consumption”

There is no detail here. No Specifics, no measurables. Without these, very little will happen.

The local government should at this stage be able to be more specific about what they want to see develop, and HOW it is going to support this. Support on its own is a totally non-committed term.