



Planning Department,
Tipperary County Council,
Civic Offices,
Emmet Street,
Co. Tipperary
E91 N512

11th September 2023

RE: Preparation of the Draft Nenagh 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 Draft Nenagh Local Area Plan (the Draft LAP), 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 final Nenagh Local Area Plan.

Climate Action

The Department notes the next iteration of the Climate Action Plan 2023 (CAP 2023), was launched on the 21st of December 2022. As such, the Department welcomes the Local Authority's reference to the CAP 2023 (Section 2.2 A Climate Resilient, Sustainable and Low Carbon-Town), and requests that the Local Authority ensure that the Local Area Plan is drafted in a manner consistent with this latest CAP 2023, in accordance with Section 15(1) of the Climate Action and Low Carbon Development Act, 2015.

The Climate Action Plan 2023 (CAP 2023) commits the Government to reducing transport emissions by 50% from 2018 emissions rates. To facilitate the reduction in greenhouse gas emissions, CAP 2023 supports the transition towards a sustainable transport system, through enhanced land-use planning, public transport, active travel, vehicle efficiency and clean fuels. In that regard, we note and support the Local Authority's inclusion of actions from the CAP 2023 and Tipperary County Development Plan, in particular, compact growth and sustainable mobility and sustainable transport measures (Section 2.2 A Climate Resilient, Sustainable and Low Carbon-Town), and welcome the Local Authority's support of reducing car dependency and promotion of active and public transport (Policy 6.1).

Renewables

The Department welcomes the Local Authority's encouragement and support of the transition to renewable energy generated locally, in particular, the Local Authority's recognition on the role of domestic scale renewables within Clonmel (Section 8.1 Energy Demand and Renewable Energy), their support in the use of renewable energy technologies at appropriate scales in residential, commercial and community developments and their support for the principle of onsite generation for self-consumption (Policy 8.1).



The Local Authority should note that the Government has increased its ambitions for renewable energy generation under the CAP 2023:- Solar PV Capacity targets have been updated to 5GW by 2025 and 8GW by 2030. Onshore wind capacity has increased to 6GW by 2025 and 9GW by 2030. The Local Authority should have regard to the updated renewable energy targets when developing renewable energy projects within the Local Area when drafting the Local Area Plan.

Built Environment and Heating

The Department notes and supports policy within the Local Area Plan which requires the retrofitting of existing structures as a preferred approach to brownfield development (Policy 2.1).

Policy which requires new developments to incorporate best practice in low-carbon and energy efficient planning and techniques is also welcomed by the Department (Policy 2.3).

The Department welcomes Objective 2A of the Local Area Plan which supports the identification and implementation of measures which reduce energy consumption and produces renewable energy from local resources. The Local Authority's support of the transition to renewable energy for heating is also noted and supported by the Department (Section 8.1 Energy Demand and Renewable Energy). The Local Authority is requested to consider the development of the electrification of heating to further this objective during the preparation of the Local Area Plan, having regard to the CAP 2023. As such, explicit policies in support of same are encouraged.



To this end, the Department encourages further consideration with regard to the energy efficiency of existing residential buildings. The CAP 2023 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 45,000 existing dwellings using heat pumps by 2025, and 400,000 by 2030. The National Residential Retrofit Plan commits the Government to retrofit 120,000 dwellings to B2 or cost optimal by 2025 and 500,000 by 2030. The Local Authority is requested to consider the development of the electrification of heating to further this objective during the preparation of the Local Area Plan, having regard to the CAP 2023. As such, explicit policies in support of same are encouraged.

District Heating

The Department welcomes the Local Authority's support of compact growth, in line with Strategic Objective No. 1 of the National Planning Framework. (Section 2.4.4 Land Use Zoning Framework and Policy 3.1). Compact growth, as recognised by the National Development Plan and the National Planning Framework, represents an opportunity to develop and roll-out district heating networks in an efficient and planned manner.

To this end, the Department notes specific policies at national and regional level that may further the policy objectives of the Local Authority, that can be taken into account when preparing the final Nenagh Local Area Plan, such as:

- 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'*.¹

¹ National Strategic Outcome 9, [National Planning Framework](#), Pg 149



- Regional Policy Objective 105: *“It is an objective to support development of district heating schemes by promoting innovation in the use of recoverable heat sources and related technologies. The development of new low carbon heat sources should include non-fossil fuel heat sources including clean electric and renewable gas heat technologies in the Region.”*²

The Department welcomes the inclusion of an objective to identify and use local renewable energy sources (Objective 5A). Bearing this in mind, the Department 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. 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. The Department encourages the Local Authority to consider the outcomes of the National Heat Study when examining the potential roll-out of district heating.

As such, more explicit policies in support of same are encouraged in the final Nenagh Local Area Plan. The Heat Policy Division is available to provide guidance and support in this regard.

Telecommunications

We consider that national policy objectives in terms of digitalisation, 5G rollout and enhancing Ireland's national and international connectivity can be further underlined and supported by County Councils and Local Authorities via specific reference to these areas in the Draft Local Area Plan. In particular, a direct callout in the draft Local Area Plan of [supporting 5G rollout](#) would be welcome from the Departments perspective.

For ducting and other assets owned by the State, we would encourage a commitment to publish inventories of these assets and develop a streamlined process to allow for easy accessibility for access seekers.

² Regional Policy Objective 105, [Southern Regional Assembly Regional Spatial & Economic Strategy](#), Pg 138



Waste and the Circular Economy

Generally, with respect to the development of waste policy, County Councils should consult directly with their respective [Regional Waste Management Planning Office](#) regarding development of the final plans.

CAP 2023 actions relating to waste include the implementation of the Waste Action Plan for a Circular Economy (WAP). The focus of the WAP is on increasing recycling and minimizing waste generation by prioritising the prevention of waste at every opportunity. As such, the Department notes and supports Objective 8C, which supports the sustainable management of waste and enables a significant reduction in the production of waste in Clonmel, in line with said plan.

We also draw 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 Local Authority is encouraged, therefore, to consider how such guidance could be incorporated into the policies of the LAP to give effect to them through the planning system.



Conclusion

We would be grateful if Tipperary County Council would take these matters under consideration in the drafting of the Nenagh Local Area Plan 2024-2030.

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 the 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

Yours sincerely,

Planning Advisory Division

Department of Environment, Climate and Communications