



Planning Department,
Tipperary County Council,
Civic Offices,
Limerick Road,
Nenagh,
Co. Tipperary
E45 A099

18th December 2023

RE: Proposed Material Amendments to the Draft Clonmel Local Area Plan 2024-2030

Dear Sir/Madam,

Further to the notice given to the Department of the Environment, Climate and Communications (the Department) of the publication of the Proposed Material Alterations to the Draft Clonmel Local Area Plan 2024-2030, the following submission outlines its observations in respect of a number of specific policy areas for which the Department is responsible.

Climate Action

The Department welcomes the proposed material alterations (MA) which further promote the objectives of facilitating the delivery of climate resilient and sustainable communities in Clonmel (at MA No.3) and the additional objective which ensures the Local Area Plan will reflect the ambitions of the National Climate Action Plan (at MA No. 4).

Heat and Energy Efficiency

The Department welcomes the proposed material alterations which include additional objectives that support the delivery of district heating (MA No. 10, Objective XX No. 55) and supports the electrification of heating under the National Residential Retrofit Plan (MA No. 8, Objective 2H No. 55).



Telecommunications

The proposed alteration which supports and facilitates the provision of telecommunications infrastructure in Clonmel is noted and supported by the Department (Objective 5M No. 55).

Renewables

The Department welcomes Objective 2A of the proposed material alterations (MA No. 55) which supports local communities 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).

Circular Economy

The Department welcomes the Local Authorities support of the sustainable management of waste and the enabling of a significant reduction in the production of waste in Clonmel, in line with the principles of the Waste Action Plan for a Circular Economy (Objective 8E No. 55).

Electricity Grid

The Department notes proposed material alteration No. 47 which states the following:

'Require that grid connection routing for renewable energy development proposals should avoid materially impacting the road network, where possible'.



It is the view of this Department that policies that prioritise the protection of a particular class of State infrastructure over another class, such as electricity, is not a matter that should be dealt with in the draft Local Area Plan. It is a matter for State Authorities to resolve bilaterally and, with specific reference to the national electricity grid and road network infrastructure, there are mechanisms in place to do so at national level. Moreover, the Department notes the following measure of the Climate Action Plan 2023 (CAP 23) with regard to the required acceleration of renewable electricity generation and the potential use of existing State infrastructure:

'Enable the use of the public road and potentially the rail networks for routing of new public and private electricity circuits'¹

It is our view, therefore, that proposed material alteration No. 47 is considered to be inconsistent with CAP 23 and its provisions, is inappropriate for inclusion in a local area plan, could have the unintended consequence of hindering the accelerated roll-out of renewable electricity (as per response no. 29 of the National Energy Security Framework), may divert grid infrastructure to more sensitive areas and has not been appropriately consulted over with the relevant authorities. As such, the Department requests the Local Authority deletes proposed material alteration No. 47 in the adopted Local Area Plan.

¹ Section 12.3.1 Climate Action Plan 2023.



Conclusion

This Department would be grateful if Tipperary County Council would take these observations into consideration in the finalisation of the Clonmel 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 additional support to the County Council in the following areas:

- Climate Action, Engagement and Adaptation
- The Circular Economy
- Energy Generation and Networks
- Energy Use / Demand in the Built Environment
- Communications
- Environmental Policy and Governance
- Natural Resources

Please direct any requests for further consultation to PlanningNotifications@DECC.gov.ie

Yours sincerely,

Planning Advisory Division

Department of Environment, Climate and Communications