



Planning Department,
Tipperary County Council,
Civic Offices,
Limerick Road,
Clonmel,
Co. Tipperary
E91 N512

9th December 2024

RE: Publication of the Draft Carrick-on-Suir Local Area Plan 2025-2031

Dear Sir/Madam,

Further to the notice given to this Department of the publication of an invitation for submissions on the Draft Carrick-on-Suir 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 Government is committed to achieving climate neutrality no later than 2050 with a 51% reduction in GHG emissions by 2030. These legally binding objectives are set out in the Climate Action and Low Carbon Development (Amendment) Act 2021 (**the Climate Act**). The Climate Act supports Ireland's transition to net-zero and the achievement of a climate neutral economy no later than 2050. It also establishes a legally binding framework with clear targets and commitments, to ensure the necessary structures and processes are in place to deliver national, EU and international climate goals and obligations in the near and long term. Against this background, strategies must be devised to reduce and manage climate change risks through a combination of mitigation and adaptation responses, both in the medium and longer term.

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. This vision also aligns with the UN 2030 Agenda for Sustainable Development and the 17 SDGs, which provide a plan of action for people, prosperity and planet, with the commitment to leave no-one behind.



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.

This will also help to deliver on the Government's 'whole-of-society' approach for the successful implementation of the SDGs, driving in particular the achievement of Goal 7 on Affordable and Clean Energy, Goal 12 on Responsible Consumption and Production, and Goal 13 on Climate Action. Achieving the SDGs overall will require fundamental changes in many parts of Irish life, but it is also an opportunity to create a cleaner, greener, fairer economy and society.

The Department asks that you take the material outlined in the following sections into consideration when finalising the Draft Carrick-on-Suir Local Area Plan, which align with our Statement of Strategy for the period 2024-2025, Le Chéile 25, which itself sets out our vision, mission, and six strategic goals in key policy areas.

The Department also asks that you take into consideration the framework of Agenda 2030, the Sustainable Development Goals (SDGs) and their respective targets, in the overall drafting of the Plan, and in relation to the specific areas outlined below.

Tipperary County Development Plan (TCDP) 2022-2028

The Planning and Development Act 2000 (as amended) require the LAP to be consistent with the objectives of the Development Plan and its Core Strategy. In this regard, the Department notes a strategic objective of the TCDP 2022-2028 is to:

'To support the just transition to a climate resilient, biodiversity-rich, environmentally-sustainable and climate-neutral economy'.¹

¹ SO-1 2.6 Strategic Objectives, 2.0 Core Strategy, Tipperary County Development Plan 2022-2028



Objectives at County level for climate action, renewable energy infrastructure, communications infrastructure inter alia should be reflected by objectives and actions of the LAP, as relevant for the plan area, to support implementation of national, regional and county level policy on these themes.

The following recommendations, which are reflected in the Department's previous submission for the pre-draft public consultation for the Carrick-on-Suir LAP, are an opportunity to further strengthen objectives of the LAP.

Climate Action

The Climate Action Plan 2024 (CAP24) is the third annual update to Ireland's Climate Action Plan. The CAP24 lays out a roadmap of actions to meet our national climate objective of pursuing and achieving the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050. The draft LAP makes no reference to the CAP24.

Having regard to same, the Local Authority should ensure that the LAP includes reference to, supports the implementation of and is consistent with the CAP24, in accordance with Section 15(1) of the Climate Action and Low Carbon Development Act, 2015 (as amended).

Recommendation 1:

The Department recommends that an objective and / or policy is included in the LAP to support the implementation of CAP24 (and annual revisions thereof).

National Adaptation Framework

The Department notes the new National Adaptation Framework (NAF) was approved by Government on the 5th of June 2024.

Recommendation 2:

The Department recommends that an objective and /or policy is included in the LAP to support the implementation of the NAF.



Local Authority Climate Action Plan

The [Tipperary County Council Climate Action Plan 2024-2029 \(Tipperary LACAP\)](#) was adopted on the 12th of February 2024. The Tipperary LACAPs central aims are aligned with the Government's national climate objective.

Under section 10(2)(n) of the Planning and Development Act 2000 (as amended), a CDP must, when being prepared, take into account the LACAP. While this provision is relevant to County Development Plans, the preparation of the draft LAP provides a positive opportunity to support the implementation of the TCDP 2022-2028 objectives for climate action and the Wicklow LACAP.

It is important that the Tipperary LACAP and related actions are appropriately reflected in the policies and objectives of the draft LAP, thereby ensuring consistency and alignment between both plans.

Recommendation 3:

The Department recommends that the LAP include objectives and / or policies to ensure the implementation of the Tipperary LACAP and related actions, thereby ensuring consistency and alignment between both Plans.

Renewable Energy

The [National Development Plan 2021-2023 \(NDP\)](#) and the CAP24 commits to increase Ireland's proportion of electricity from renewable sources to 80% by 2030. This measure will be achieved through a combination of onshore and offshore renewable sources supported by various support schemes, including the [Renewable Electricity Support Scheme \(RESS\)](#), the [Small-Scale Renewable Electricity Support Scheme \(SRESS\)](#) and the [Micro-Generation Support Scheme \(MSS\)](#).

Small-scale and community generation will be supported via the SRESS. SRESS offers a simpler route to market for community and other small-scale renewable projects. Unlike RESS, the SRESS is not auction-based and support for projects will be provided through a guaranteed tariff. The MSS delivers a range of measures to support micro-generation (both for self-consumption and for export).



The Local Authority should note the updates to the national policy context, in particular the CAP24, including Government's renewable electricity generation targets: Solar PV Capacity targets of 8GW by 2030. Onshore wind capacity of 9GW by 2030, in addition to the commitment to supporting at least 500 MW of local community-based renewable energy projects and increased levels of new micro-generation and small-scale generation.

The Department notes the positive objectives of the TCDP 2022-2028 concerning the support and promotion of renewable energy, including:

- *“Promote and facilitate renewable energy development, in accordance with the policies and objectives of the Tipperary Renewable Energy Strategy 2016 (and any review thereof), and the Tipperary Climate Adaptation Strategy 2019”.*²
- *‘In accordance with the objective of the Renewable Energy Strategy (and any review thereof), to encourage and support community energy schemes, and ways to incorporate energy efficiency and renewable energy development at the community level, though micro-generation, auto-production and investment in commercial energy production’.*³
- *‘It is the policy of the Council to facilitate microrenewable energy installations and autogenerator installations where it is demonstrated to the satisfaction of the Council that they will not result in a significant adverse impact on residential, visual or environmental amenity’.*⁴

The Department welcomes the inclusion of objectives (including Policy 8.1, Objective 2A and Objective 5A) which generally align with these objectives. It is crucial that all future development seek to increase their contribution to the national renewable electricity generation target and, where possible, aim for developments that are carbon or energy use neutral.

² Planning Policy 3-1, 3.6 Planning Policy, 3.0 Low-Carbon Society & Climate Action, Tipperary County Development Plan 2022-2028

³ Planning Objective 3-F, 3.7 Planning Objectives, 3.0 Low-Carbon Society & Climate Action, Tipperary County Development Plan 2022-2028

⁴ Policy RE13: Micro-Generators and Auto-Generators, 6.11 Micro-Generation and Auto Generation, 6.0 Policies and Objectives for Renewable Energy, Renewable Energy Strategy



Electricity Grid

Recommendation 4:

The Department recommends that the draft LAP should include reference to:

- [Shaping Our Electricity Future 1.1](#), EirGrid's updated roadmap for the development of the transmission grid out to 2030 to deliver on the 80% renewable energy targets.
- ESB's [Networks Strategy: Networks For Net Zero](#), which sets out ESB Networks' role in enabling the delivery of the Government's Climate Action Plan 2023 and supports the decarbonisation of the electricity system by 2040.

Built Environment and Heating

The CAP24 includes 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 Department notes policy of the Southern Regional Assembly and Local Authority which states:

- *'Local authorities shall include objectives in statutory land use plans to promote energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock, energy efficiency in traditional buildings and initiatives to achieve Nearly Zero-Energy Buildings (NZEB) standards in line with the Energy Performance of Buildings Directive (EPBD)'.⁵*
- *'Require the retrofitting and reuse of existing buildings (where practical) rather than their demolition and reconstruction'.⁶*
- *'Promote energy conservation, energy efficiency and the use of renewable energy sources in buildings, including retro fitting of energy efficiency measures in the existing building stock in line with the requirements of the Building Regulations 1997 – 2021 (and any amendment thereof)'.⁷*

⁵ Regional Policy Objective 56d, Southern Regional Assembly Regional Spatial & Economic Strategy

⁶ 3-3, 3.6 Planning Policies, 3.0 Low Carbon Society & Climate Action, Tipperary County Development Plan 2022-2028

⁷ 3-4, 3.6 Planning Policies, 3.0 Low Carbon Society & Climate Action, Tipperary County Development Plan 2022-2028



The Department welcomes the inclusion of objectives (including Policy 2.1, Objective 2A, 2G and 2H) which generally align with these objectives.

Compact Growth and District Heating

When preparing the draft LAP, due regard should be given to the ambition of the National Planning Framework, Regional Spatial and Economic Strategy and the TCDP which requires the achievement of compact growth and explicitly recognises the potential for such compact growth to facilitate the development of low carbon district heating.

Examples include:

- 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'*.⁸
- 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'*.⁹
- *'It is the policy of the Council to support and facilitate the installation DH technologies in new developments in Tipperary including multi-unit apartment developments, commercial and industrial developments. Where DH is proposed, the associated infrastructure, networks and services for such systems shall be identified at planning stage and the long-term management and maintenance arrangements shall be to the satisfaction of the Council'*.¹⁰
- *It is an objective of the Council to carry out a Heat Mapping exercise with the support of the TEA to help visualise and assess heat demands, where sources of heat might come from and how these can be connected in an efficient way to reduce the cost of heat supply and the carbon intensity of heat generation in Tipperary'*.¹¹

⁸ National Strategic Outcome 9, [National Planning Framework](#), Pg 149

⁹ RPO 105, Southern Regional Assembly Regional Spatial & Economic Strategy

¹⁰ Policy RE7 District Heating, 6.6.2 District Heating, 6.0 Policies and Objectives for Renewable Energy, Renewable Energy Strategy

¹¹ SO12, 6.12.2 Renewable Energy Objectives, 6.0 Policies and Objectives for Renewable Energy, Renewable Energy Strategy



As such, the Department welcomes the objectives of the draft LAP which provides ‘*support, data and information where available to developers seeking to develop or be part of district heating and centralized biomass/biogas boiler/heat pump systems, whether private/public or mixture of both*’.¹²

Recommendation 5:

However, the Department further recommends that the Local Authority examine the potential of district heating, including district heating derived from waste heat, where available, technically feasible and cost effective and commit to carrying out a feasibility exercise and the use of heat mapping in support of same in the draft policies, having regard to the CAP24, RSES, TCDP, NSO 9 of the NPF and the [National Heat Study](#). As such, policies in support of same are encouraged in the draft LAP.

Circular Economy and Waste

The Department notes the objective of the Local Authority in the TCDP 2022-2028, 3-2 and 3-D, which states:

- ‘*Support and encourage innovative initiatives that promote the development of the Circular Economy as set out in the Waste Action Plan for a Circular Economy (DECC, 2020). New developments that generate a significant amount of waste heat may be required to submit a ‘Heat Loss’ Assessment, where practical, to demonstrate effective reuse of waste heat*’.
- ‘*Support and facilitate the objectives of the ‘Waste Action Plan for a Circular Economy’ (DECC, 2020) across the delivery of our services*’.

New guidance in respect of construction waste management, titled “*Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects*” published by the Environmental Protection Agency in 2021. The purpose of these guidelines is to provide a practical approach to construction and demolition (C&D) waste, which is informed by best practice in the prevention and management of such wastes and resources from design through to construction and deconstruction.

¹² Objective 2H, 2.5 Policy and Objectives, 2. Planning and Development Strategy, Draft Carrick-on-Suir Local Area Plan 2025-2031



The implementation of this best practice is consistent with the circular economy consistent with Government policy under *Whole of Government Circular Economy Strategy 2022 – 2023* and *The Circular Economy Programme 2021-2027* (EPA).

Recommendation 6:

The Department welcomes the objective of the draft LAP which supports ‘*the sustainable management of waste and enable a significant reduction in the production of waste in Carrick-on-Suir, in line with the principles of the Waste Action Plan for a Circular Economy 2024-2030 (and any review thereof)*’. However, we recommend that the draft LAP include a reference to the EPA’s *Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects* (2021).

In this regard, the Department would advise the Local Authority to consult with their respective Regional Waste Management Planning Office regarding development of the LAP, particularly in relation to any policies which may preclude the continued use of existing waste management infrastructure or development of new waste management infrastructure.

The Department would also ask the Council to have regard to the targets set out in the SDGs, in particular in relation to SDG12 – Responsible Consumption and Production.

Telecommunications

The facilitation and support of the development of telecommunications infrastructure is crucial to the development of the modern economy. In this regard National Strategic Objective 6 of the National Development Plan 2021-2023, states that high-quality, secure, and reliable connectivity to global telecommunications networks is of significant strategic importance to the Irish State. In addition, *Harnessing Digital – the Digital Ireland Framework*’ (Department of the Taoiseach, 2022) recognises the importance on supporting 5G rollout across all populated areas of Ireland by 2030.

Recommendation 7:

The Department recommends that the draft LAP includes reference to and includes objectives and /or policies to support and facilitate the development telecommunications infrastructure in line with Government policy, including the rollout of 5G.



Air Quality

The Department encourages the Local Authority to have regard to the [Clean Air Strategy for Ireland](#), bearing in mind the impacts of measures adopted in the draft CDP on current and future air quality.

Air quality data is available from EPA at www.airquality.ie. This gives details of the locations of all monitoring stations currently in operation, along with real-time and historic data from each station.



Conclusion

We would be grateful if Tipperary County Council would take these matters under consideration in the drafting of the Carrick-on-Suir Local Area Plan 2025-2031.

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 Councils 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)
- UN Agenda 2030 and the Sustainable Development Goals (SDGs)

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

Yours Sincerely,

Planning Advisory Division

Department of the Environment, Climate and Communications

Encl.

1. List of Recommendations



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