



Forward Planning Section,
Roscommon County Council,
Aras an Chontae,
Co. Roscommon
F42 VR 98



2nd February 2024

RE: Preparation of the Draft Roscommon Town 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 Roscommon Town 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 Roscommon Town Local Area Plan.



Roscommon County Development Plan (RCDP) 2022-2028

The Planning and Development Acts 2000 (as amended) requires the LAP to be consistent with the objectives of the Development Plan and its Core Strategy. In this regard, DECC notes the positive objectives of the RCDP 2022-2028, which sets out appropriate policy objectives in order to reduce the county's overall carbon footprint and increase energy efficiencies across a range of sectors. 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 are an opportunity to strengthen objectives of the LAP.

Climate Action

The [Climate Action Plan 2023](#) (CAP23) was the first climate plan adopted on a statutory basis and is currently being updated as [Climate Action Plan 2024](#) (CAP24).¹ The Local Authority should, therefore, ensure that the Local Area Plan is updated and drafted in a manner consistent with this latest CAP, following its finalisation, in accordance with Section 15(1) of the Climate Action and Low Carbon Development Act, 2015 (as amended); (e.g. reference to the Climate Action Plan 2023 in Section 1.3.4 Climate Action should be amended to reference CAP24).

We welcome that the draft LAP has been prepared with a full recognition of the need to address climate change, by implementing a clear framework for sustainable development, compact growth and best practice in low carbon planning, green energy and design (1.3.4 Climate Action). Policy of the Local Authority which supports the transition to a low carbon, climate resilient community is noted and supported by the Department (RN 45).

¹ The Department notes the CAP24 is open for public consultation in early 2024 and will be adopted in early 2024.





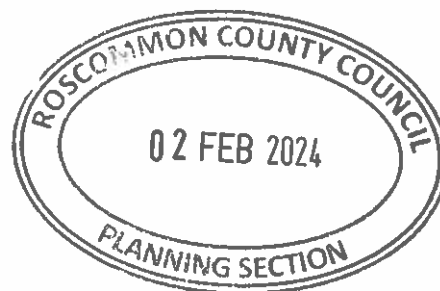
The Climate Act 2021 sets out that each local authority shall prepare and make a plan, referred to as a Local Authority Climate Action Plan (LA CAP), specifying the mitigation and adaptation measures to be adopted for a period of five years. The plans represent a new opportunity to further embed climate mitigation and adaptation in local authority Development Plans and will enhance local authorities' ability to lead, coordinate and become agents of change in response to the ongoing climate change crisis. The plans are due to be adopted in early 2024. The preparation of the LAP is a positive opportunity to support the implementation of the RCDP 2022-2028 objectives for climate action and support the implementation of the Roscommon Climate Action Plan.

Recommendation 1:

Consistent with climate action policies and objectives of the RCDP 2022-2028, the LAP should support the implementation of the national Climate Action Plan and the Roscommon County Council Climate Action Plan through the preparation of effective and specific objectives and actions for climate action in LAP area.

Recommendation 2:

The Department notes Roscommon Town is a decarbonisation zone, which is stated to 'serve as an exemplar model for best practice in the context of decarbonisation, green infrastructure and energy efficiency'.² As such, it is recommended that the Local Authority should seek to ensure that the Local Area Plan is drafted in a manner that is consistent with the Local Authority Climate Action Plan, as well as the CAP24 (which is required under Section 15(1) of the Climate Action and Low Carbon Development Act, 201; as amended).



² Roscommon County Development Plan 2022-2028, Chapter 8 Climate Action, Energy and Environment, Section 8.2



As noted in the draft LAP (7.2 Overview), CAP24 commits the Government to reducing transport emissions by 50%. To facilitate the reduction in greenhouse gas emissions, CAP24 supports a significant increase in sustainable transport trips, through enhanced land-use planning, public transport, active travel, vehicle efficiency, 20% reduction in total vehicle kilometres, 50% reduction in fuel usage, fleet electrification and biofuels. In that regard, we note and support the Local Authority's support for the development of transport initiatives that reduce emissions, including public transport, active travel and reducing car use (RN 27).

The [National Adaption Framework](#) (NAF) sets out the national strategy to reduce the vulnerability of the country to the negative effects of climate change and to avail of positive impacts. The NAF outlines a whole of government and society approach to climate adaptation in Ireland. It also aims to improve the enabling environment for adaptation through ongoing engagement with civil society, the private sector, and the research community. The publication of a draft NAF has been approved by the Minister with a statutory public consultation to commence in January 2024.

Recommendation 3:

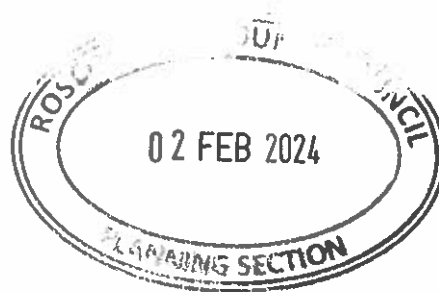
The Local Authority is requested to include specific reference to the NAF and any subsequent variations in the finalised Local Area Plan, by incorporating policy which is consistent with the updated NAF and policies in the RCDP 2022-2028.

Renewables

The Department notes objectives in the RCDP 2022-2028 which states:

- Support developments and actions that assist in achieving the national targets for energy from renewable energy, from renewable resources and reducing greenhouse gas emissions associated with energy production (CAEE 8.3 RCDP 2022-2028).





- Encourage and facilitate the various forms of renewable energy development detailed in the Renewable Energy Strategy that accompanies this Plan (as well as any other new forms of renewable energy which may be developed during the lifetime of this Plan), subject to satisfying the principles of proper planning and sustainable development (CAEE 8.4 RCDP 2022-2028).

As such, the Local Authority's facilitation of the incorporation of renewable technologies in new residential development (RN 5) and promotion of an increased use of renewable energy sources in existing residential properties (RN 8) is noted and supported.

The CAP 2024 includes actions to accelerate renewable electricity generation:

- By delivering a streamlined electricity generation grid connection policy and process, and remove barriers, where possible, for the installation of renewables and flexible technologies reducing the need to build new grid, including hybrid (wind/solar/storage) connections.
- Ensuring that the permit-granting procedure, the planning, construction and operation of renewable energy plants, the connection of such plants to the grid, the related grid itself, and storage assets are presumed as being in the overriding public interest.

We also note the objective of the Local Authority to facilitate a modern electricity network within the county.³

Recommendation 4:

We would encourage the inclusion of an objective of the Councils in the LAP to promote the development of appropriately scaled renewable energy installations (rooftop solar, geothermal energy and other types of installations appropriate to urban environments), and to support the development of additional supporting grid infrastructure, in line with the CAP24 and policy in the RCDP 2022-2028.

³ Roscommon County Development Plan 2022-2028, Chapter 8 Climate Action, Energy and Environment, CAEE 8.9



The Local Authority should note the national targets in CAP24: Solar PV Capacity targets of 5GW by 2025 and 8GW by 2030. Onshore wind capacity of 6GW by 2025 and 9GW by 2030. The Local Authority should have regard to the renewable energy targets when developing renewable energy projects in the local area when drafting the Local Area Plan.

The Department notes the following measure of the CAP24 with regard to the required acceleration of renewable electricity generation and the potential use of existing State infrastructure:

'All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution'⁴

Recommendation 5:

We request that the Local Authorities ensure that no objectives are included in the final LAP that precludes options relating to the use of public infrastructure for multiple purposes.

Built Environment and Heating

We note policy of the Local Authority in the RCDP 2022-2028 which states:

'Promote the integration of energy efficient systems in all new development proposals, as well as the retrofitting of existing development, in order to increase energy efficiency throughout the built environment in accordance with proper planning and sustainable development'. (CAEE 8.14 RCDP 2022-2028)

⁴ Section 12.4.1 Climate Action Plan 2024.





As such, we welcome policy of the Local Authority which promotes the retrofitting of existing dwellings with green energy design solutions, to support a transition towards energy efficiency and increased use of renewable energy sources in existing residential properties (RN 8), while promoting the integrating of energy efficient systems in all new developments, as well as retrofitting existing developments to increase energy efficiency (RN 47).

The CAP24 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.

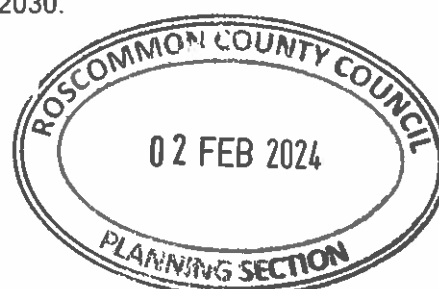
Recommendation 6:

We encourage further consideration with regard to the energy efficiency of existing residential buildings. The Local Authority is requested to consider the development of the electrification of heating to further their objective during the preparation of the Local Area Plan, having regard to the CAP24. As such, explicit and target-based policies in support of retrofitting and the electrification of heat are encouraged in the finalised Local Area Plan.

District Heating

The Department welcomes the Local Authority's support of sustainable compact growth (4.3 Compact Growth). 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.

The CAP24 supports the growth and development of efficient district heating, setting targets of up to 0.8 TWh of district heating installed capacity across both the residential and commercial building stock by 2025, and up to 2.7 TWh by 2030.





We note 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 Roscommon Town 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'*.⁵
- Regional Policy Objective 4.20: *'Support and encourage the development of the bio-economy sector, and facilitate its development for energy production, heat, and storage distribution, in particular advocating Combined Heat and Power Units integrated into District Heating networks...'*⁶

Recommendation 7:

We encourage 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, explicit policies in support of same are encouraged in the final Roscommon Town 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.

⁵ National Strategic Outcome 9, [National Planning Framework](#), Pg 149

⁶ Northern and Western Regional Assembly, Regional Spatial and Economic Strategy 2020-2032, Regional Policy Objective 4.20





Recommendation 8:

We recommended specific reference to these areas in the Draft Local Area Plan. In particular, a direct reference in the draft Local Area Plan of supporting 5G rollout would be welcome from the Departments perspective.

Recommendation 9:

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.

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.

CAP24 actions relating to waste include the continued 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.

We note policy in the RCDP 2022-2028 which states:

'Promote the principles of the circular economy in minimising waste going to landfill and maximise waste as a resource, with prevention, preparation for reuse, recycling and recovery prioritised in that order, over the disposal of waste. (ITC 7.60 RCDP 2022-2028).'





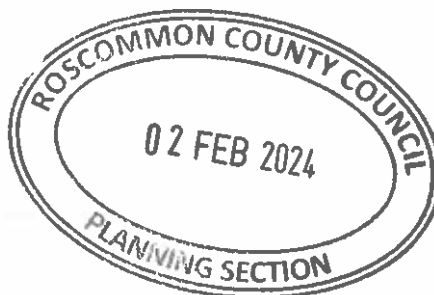
Recommendation 10:

We encourage the Local Authority to support and promote circular economy principles in the Roscommon Town Local Area Plan and implement policy for same. We also request that the Local Authority considers the inclusion of direct references to the principles of the circular economy throughout the Draft Plan, to further this objective of the Local Authority.

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.

Recommendation 11:

The Local Area Plan should have regard to the guidance "*Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects*" and give effect to them through the objectives of the plan.





Conclusion

We would be grateful if Roscommon County Council would take these matters under consideration in the drafting of the Roscommon Town 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 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)

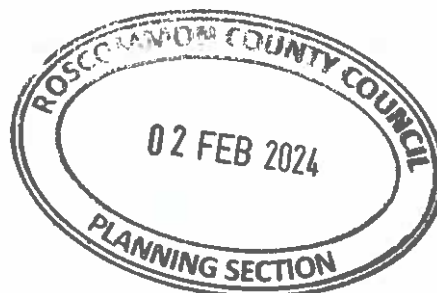
Please direct any requests for further consultation to PlanningNotifications@decc.gov.ie

Yours sincerely,

Planning Advisory Division

Department of Environment, Climate and Communications

Encl. List of Recommendations





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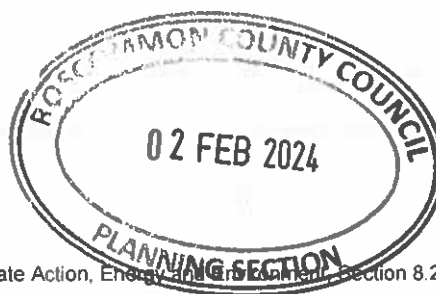
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