

National Planning Framework Consultation. Forward Planning Section, Department of Housing, Planning, Community and Local Government, Custom House. Dublin D01 W6X0 By Email to NPF@housing.gov.ie

Dear Sir/ Madam,

The Tipperary Energy agency welcomes the opportunity to respond to the national planning framework consulatation. As part of our work with Tipperary County council, we would have inputted a number of suggestions into their response, and this submission strongly supports their submission.

The Tipperary Energy Agency is a non profit public good social entrprise established by the Tipperary County Councils and the Tipperary Rural business development unit (Now limerick Institute of technology, Tipperary) in order to support County Tipperary on the transition to a sustainable energy future. To this end, we have supported people, communities the public sector and the private sector to implement robust actions at a local level to decrease energy use and fossil fuel use. Some of our key achievements:

- Led the retrofit of over 1500 homes in Tipperary across EU, National and local programs.
- Supported the construction of Ireland's only community wind farm
- Suppored the development of local energy strategies (statutory and non statutory)
- Supported the investment of over €30M in sustainable energy in the county.
- Undertakken over 30 EU funded research projects and programs.

We have a number of additional points to make in addition to the Tipperary County Council submission that are noted below.

Ireland is failing on our CO2 reduction, Climate change and Sustainable energy targets. This is setting Ireland up for a future of signficant increase in extreme wearther events in addition to the financial penalties associated with the failure to reach comitted to goals. The national planning framework needs to be acutely aware of this with regard to spacial planning.

Tipperary is and will continue to be a rural economy based on agriculture with reasonably small clusters of manufacturing. In the future there are is one key opportunity fopr Tipperary that is emerging currently: The opportunity individuals can participate in high level service sector roles (IT, Professional services) that can be facilitated while living in Tipperary

- Remote work several days per week from home or serviced office hubs in towns and villages.
- Where transport links are sufficient for them to travel to the main population centres without significant societal costs.





This opportunity must be supported whereever possible in the context of an 80-95% shift away from fossil fuel carbon emissions by 2050.

- 1. Recognising that Transport on the main arteries of Ireland should be heavilyt weighted to public transport. The current rail services in Tipperary are a perfect contrast – Where there is well served public transport (e.g. Thurles) there is a culture of travelling to dublin, limerick and cork by train versus where is a poor rail service e.g. Nenagh where there is a continuous stream of trafic from nenagh to limerick every monring. This has an impact on the health and wealth of our society that does not need to be the case. There are developments in by of signifiaent Required expansion energy use targets.
 - Ireland is little bigger than a large global city, where rapid and frequent public transport coupled with electic private transport for the last 20km of travel could achieve a vibrant rural economy and ease signficant pressure on the higher desity urban areas. The emergence of autonomous light rail could present an opportunity to achieve these cost reductions to make the heretofore expensive under-utilised rail network profitable on a whole cost basis. The current rail transport from nenagh and clonmel to dublin, limerick, cork is insufficiently connected nor frequent to be effective in terms of cost or enviornmental benefits.
- 2. Public transport needs to be idientified as the backbone of the energy transition. The national planning framework must identify how, in the context of sustainable development, all major developments are connected to public transport. It is inconcievable how, in the full knowldge that we need to decrease transport fossil fuel use by 80-95% by 2050 that we can construct private or public infrastructure that will result in a significantly larger transport energy use.
- 3. Development plans and patterns must support the development of rural towns and villges by utilising a combination of public policy initiatives such as:
 - a. Public led service site developments in rural villages to de-risk private developers whoi would otherwise not construct small number construction sites appropriate for
 - b. site value taxation for larger sites adjacent to towns for higher density developments.
- 4. There needs to be significant cross departmental co-ordination between the department of transport, department of climate action and the department of Housing in order to achieve an integrated climate proof national planning framework. In particular the National planning framework must set-out to achieve an 80-95% reduction in carbon emissions by 2050 as per the 2015 energy white paper, our obligations under the Paris accord and our obligations under the European union directives.





5. Energy should be a mandatory requirement of spacial planning in all county and town plans, and in particular heat planning to identify where there is waste heat available that could be utilised for heating homes and businesses. There is a clear opportunity in irealdn to utilise heat networks powered by waste and renewable heat. Denmark, which has over 50% of it's heat supplied by waste heat requires all local authorities to carry out heat planning, this has been further elaborated by training received by planners by the Sustainable Energy Authority of Ireland.

Yours Sincerely,

Paul Kenny. B. E. C. Eng. MIEI

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Chief Executive of Tipperary Energy Agency.