

**An Roinn Comhshaoil,
Aeráide agus Cumarsáide**
Department of the Environment,
Climate and Communications



Planning Department,
Clare County Council,
New Road,
Ennis,
Co. Clare,
V95 DXP2.

30 December 2022

**RE: Proposed Amendments to the Draft Clare County Council Development Plan
2023-2029**

Further to the notice given to the Department of the Environment, Climate and Communications (the Department) of the publication of the Proposed Amendments to the Draft Clare County Development Plan 2023-2029, 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 notes and supports the Local Authority's facilitation of the reduction of CO2 emissions from transport, in line with the National Climate Action Plan¹.

The Department notes the next iteration of the Climate Action Plan 2023 (CAP 2023), was launched on the 21st of December 2022. The Local Authority should, therefore, ensure that any proposed material amendments are made 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 (as amended).

¹ Proposed Amendments Volume 1 Written Statement, Section 11.1, Pg 127



Circular Economy

The additional references to the principles of circularity and the transition from a linear to a circular model to keep resources in use as long as possible are particularly noted and welcomed.

In particular, Section 11.5.1, Waste Management Plans, are noted and supported.² The Council is commended for its approach to addressing the Circular Economy in the proposed material alterations.

Offshore Energy

The Local Authorities reference to the updated offshore electricity targets of 7GW by 2030 is noted and supported.³ The Local Authority should have regard to the CAP 2023 in relation to offshore wind energy capacity. The Offshore Wind Delivery Taskforce will publish a system-wide plan for the delivery of offshore wind in Q1 2023. The Local Authority is requested to consult with all future plans and strategies prepared by the Government relating to offshore wind.

Renewables

The Draft Volume 5 Renewable Energy Strategy references the updated renewable energy targets under the Climate Action Plan 2021.

*“The Climate Action Plan 2021 increased the ambition of Irelands renewable electricity targets from 70% outlined in the Climate Action Plan 2019 to 80%”.*⁴

² Proposed Amendments Volume 1 Written Statement, Section 11.5.1, Pg 174

³ Proposed Amendments Volume 5 Clare Renewable Energy Strategy, Section 9.2.3, Pg 18

⁴ Draft Volume 5 Clare Renewable Energy Strategy, Section 7.1, Pg 63



While reference to updated renewable energy targets is noted and supported, there are inconsistencies remaining in Volume 5, as it also references the previous 70% renewable electricity target within the proposed amendments, as follows:

*“As the electricity grid is transformed towards 70% renewable energy”.*⁵

*“The National Climate Action Plan target to meet 70% renewable electricity generation in Ireland by 2030”.*⁶

*“By 2030 Ireland must achieve 70% of power generation from renewable Energy sources”.*⁷

The Local Authority is requested to update reference to renewable electricity targets and ensure consistency within the Written Statement and Renewable Energy Strategy, as per the obligations under the CAP 2023 (where possible, having regard to the material amendments being proposed). Inconsistencies across the renewable electricity strategy may lead to issues when interpreting the plan during decision-making at project level.

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 is requested to, where possible having regard to the material amendments being proposed, use the updated targets in the final Clare County Development Plan.

⁵ Proposed Amendments Volume 5 Clare Renewable Energy Strategy, Pg 3

⁶ Draft Volume 1 Written Statement, Section 2.9.6 Solar Energy, Pg 48

⁷ Proposed Amendments Volume 1 Written Statement, Chapter 11, Section 11.8.5, Pg 186



Conclusion

This Department would be grateful if Clare County Council would take these observations into consideration in the finalisation of the Development Plan.

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

Regards,

Planning Advisory Division

Department of Environment, Climate and Communications

Encl. Supplementary Submission from Geological Survey Ireland



Planning Department
Clare County Council
New Road
Ennis
Co Clare, V95 DXP2

13 December 2022

Re: Proposed Amendments to the Draft Clare Draft Development Plan 2023-2029

Your Ref: n/a

Our Ref: 22/494 [c.f. 20/235, 21/469]

Dear Sir/Madam,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to ‘Geological Survey Ireland’.

With reference to your email received on the 05 December 2022, concerning the Proposed Amendments to the Draft Clare Draft Development Plan 2023-2029, Geological Survey Ireland would like to make the following additional comment since our last response.

Natural Resources (Minerals/Aggregates) and Geoheritage

In Section 8.3.6 ‘Extractive Industry’, Development Plan Objective: Minerals, Mining and Quarrying, CDP 8.14 of the draft CDP, we welcome the addition of County Geological Sites and also the inclusion of section b to support a restoration plan when extraction activities have ceased.

Development Plan Objective: Minerals, Mining and Quarrying	
CDP 8.14	<p>It is an objective of Clare County Council:</p> <p>a) To promote the extraction of minerals and aggregates and their associated processes where such activities do not have a significant negative impact on the environment, landscape, public health, archaeology, County Geological sites and/or sites of geological importance or residential amenities of the receiving environment and where such operations are in compliance with all national regulations and guidelines applicable to quarrying and mining activities.</p> <p>b) To support the satisfactory and sensitive re-instatement and / or re-use of disused quarries and extraction facilities, where active extraction use has ceased. Future uses should include amenity, recreation and biodiversity areas and shall be informed by an assessment of the specific site/lands in accordance with the restoration plan under the facility’s EPA licence.</p>



Geotourism and Geoheritage

Within the draft CDP, we are pleased to see the inclusion of geological sites in the recommendation to “support and promote, with the co-operation of private landowners, public access and interpretive signage at heritage sites and areas of geological interest” within Development Plan Objective: Tourism in North Clare and The Burren, CDP9.24.

f) To support and promote, with the co-operation of private landowners, public access and interpretive signage at heritage sites and areas of geological interest and features where appropriate;

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Dr. Clare Glanville
Senior Geologist
Geological Survey Ireland

Trish Smullen
Geoheritage and Planning Programme
Geological Survey Ireland