

NPF Submissions,
Forward Planning Section,
Department of Housing, Planning,
Community and Local Government,
Custom House,
Dublin D01 W6X0

10th November 2017

Re: Consultation on National Planning Framework (NPF) 2040

1.0 Introduction

Brookfield Renewable Ireland is pleased to have the opportunity to participate in this stage of consultation on the Draft National Planning Framework 2040.

Brookfield Renewable operates one of the world's largest publicly-traded renewable power platforms operating across Europe, North America and South America with more than 10,700 MW of installed capacity. Brookfield's Irish portfolio consists of 370 MW of operating and wind capacity across 20 wind projects in 9 counties, generating energy for approximately 224,000 homes and employing close to 100 people in Cork.

Brookfield is deeply committed to complying with national policy, contributing to the reduction of greenhouse gas emissions, enhancing Ireland's energy security and contributing to a post-carbon and climate resilient economy. As it currently stands, Ireland is falling behind in meeting its stated targets in respect of renewable energy and considerable effort is needed by all citizens to meet the significant challenges ahead. Brookfield believe that a key part of the transition to a low carbon economy and renewable energy systems is in the implementation of a clear national planning framework that informs and is consistent with regional planning frameworks.

We believe that renewable energy represents the one of the greatest opportunities for Ireland not alone in supporting the progression to a low-carbon economy but also in

- promoting energy sustainability and security of supply;
- improving air quality;
- providing a significant economic boost through job creation, commercial rates, and community benefit and finally;
- attracting inward foreign investment for example from major global businesses who are committed to securing a 100% renewable energy supply¹.

Brookfield recognise that a robust and efficient "plan lead" system is required in Ireland and that the National Planning Framework will be key in the responsible development and the delivery of the wide reaching economic, social and environmental benefits of Ireland's indigenous renewable resources. As the current consultation will inform the vision, objectives and policies of the new National Planning Framework, Brookfield very much welcome the opportunity to make a submission and hope our views will be taken on board.

¹ <http://re100.org> The world's most influential companies, committed to 100% renewable power

2.0 Brookfield's Consultation Response on the draft National Planning Framework

The National Planning Framework (NPF) is the Government's proposed long-term strategic planning framework which will guide national, regional and local planning and investment decisions over the next 25 years to 2040. Brookfield first and foremost commend the authors of the NPF in the positive statements throughout the document on renewable energy including;

- general support of renewable energy development roll out;
- commitment to off-shore renewable energy development;
- a recognition of the role renewables play in encouraging a strong digital/clean tech economy, attracting inward investment and
- a recognition of the need to support key grid infrastructure alongside the roll out of renewables such as internal grid infrastructure as well as interconnections with Northern Ireland, France and Europe.

A key indicator of this positive approach and the urgency around climate action is the inclusion at the very beginning of the document of the following Key Elements in Ireland 2040 (Pg 8);

"The future planning and development of our communities at local level will be refocused to tackle Ireland's higher than average (45%) carbon-intensity per capita and enabling a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country's prodigious renewable energy potential and electrification of much of our mobility and energy systems."

And in the following statements,

Section 8.2 of the Draft NPF, under the heading of 'Climate Action and Planning' states:

In addition to legally binding targets agreed at EU level, it is a national objective for Ireland to transition to a competitive low carbon, economy by the year 2050. The National Policy Position²⁷ establishes the fundamental national objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, guided by a long-term vision based on:

- *an aggregate reduction in carbon dioxide (CO₂) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors.*
- *in parallel, an approach to carbon neutrality in the agriculture and land-use sector, including forestry, which does not compromise capacity for sustainable food production.*

Section 8.2 of the Draft NPF, under the heading of 'Energy Policy and Planning' also states:

*"Our transition to a low carbon energy future requires:
A shift from predominantly fossil fuels to predominantly renewable energy sources"*

Brookfield

Section 9.1 of the Draft NPF details the National Strategic Outcomes for consideration in developing the National Investment Plan, including the Transition to Sustainable Energy. One of the targets identified is to:

“Deliver 40% of our electricity needs from renewable sources by 2020 with a strategic aim of in excess of 50% by 2030 and more by 2040 and beyond using wind, wave, solar, biomass and hydro sources.”

The Draft NPF also includes the following objective as ‘National Policy Objective 57’:

“Promote renewable energy generation at appropriate locations within the built and natural environment to meet objectives towards a low carbon economy by 2050.”

Brookfield support the Government in all of the above statements, however given the urgency with respect to Climate change and the fact that Ireland looks to be falling short of its Greenhouse gas emission targets and its 2020 renewable energy, heat and transport targets Brookfield would be very keen to see how Objective 57 of the Draft NPF and other objectives relating to climate change, are going to be achieved, so that the vision is defined and can be implemented through other regional and local planning policy documents that will be prepared subsequent to the adoption of the NPF.

Draft NPF Objective 44 supports the development of *“Ireland’s offshore renewable energy potential, including domestic and international grid connectivity enhancements”*. While Brookfield welcome this objective the NPF should include a similar objective specific to on-shore renewables, with wind energy being specifically referenced given the significant contribution that onshore renewables, and wind energy in particular, has already made and will continue to make in Ireland’s energy transition.

3.0 National Planning Framework and Low Carbon Economy Investment Opportunities

Brookfield commend the Government in recognizing the investment opportunities to be gained from the “Green Economy” as borne out in the following statement in Section 1 Ireland 2040 Vision

*“Key areas where we need to develop capacity for new forms of self-reliance include reducing our dependence on imported energy and building a ‘circular economy’. The National Climate Policy Position establishes the fundamental national objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. The benefit of making the transition to a low-carbon economy is that a **reliable, sustainable and affordable low carbon energy system would make us a global “go-to” location for enterprises and activities that require energy but without environmental impact.**”*

And

*“Ireland is very attractive in terms of international digital connectivity, climatic factors and current and future renewable energy sources for the development of international digital infrastructures, such as data centres. This sector underpins Ireland’s international position as a location for ICT and creates added benefits in relation to establishing **a threshold of demand for sustained development of renewable energy sources.** There is also greater scope to recycle waste heat from data centres for productive use, which may be off-site.”*

Brookfield believe Ireland can capitalize on the demand from International organisations for renewable energy by ensuring the planning framework around renewable energy development is **clear, consistent with minimal uncertainty** thus ensuring a ready and enduring supply to meet this demand.

4.0 Investment in Grid Infrastructure

Brookfield welcome the following statements within the NPF document with regards to grid infrastructure investment to support renewables;

“National Policy Objective 49

Strengthen all-island energy infrastructure and interconnection capacity to enhance security of electricity supply.”

Section 9.1- National Strategic Outcomes includes the following statements

“New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand.”

“The development of on-shore and off-shore renewable energy is critically dependent on the development of enabling infrastructure including grid facilities to bring the energy ashore and connect to major sources of energy demand. We also need to ensure more geographically focused renewables investment to minimise the amount of additional grid investment required, for example through colocation of renewables and grid connections.”

“Strengthen energy security and resilience to support an island population of 8 million people through effective north-south electricity grid interconnection as well as exploring other interconnection options in the longer term to 2040 such as the ‘Celtic Interconnector’ with France.”

“National Interconnector (Sub-sea Ring around Ireland (provides connection to EU via the proposed Celtic Interconnector) or other solutions offer the potential to connect Ireland to the EU electricity grid System.”

While the above statements are hugely positive Brookfield would however encourage a follow up action plan with timelines that clearly indicate how the planning process can be made more streamlined and efficient to enable the strategic grid infrastructure such as these to be implemented in a timely manner. We would also greatly support a **joined up approach** with regards to permits for grid connections and planning permission to ensure that all the necessary ingredients to develop renewable energy are dealt with as efficiently as possible.

5.0 Planning Policy Certainty and Regional Strategies

Across Ireland, there are significant differences in the forward planning policies and development management practices for wind energy across different local authority areas. There is also an inconsistent application of national policy and Departmental guidance in some Local Authority areas. The disparity in approaches for wind energy planning policy is evidenced by the number of Ministerial Directions, issued under Section 31 of the Planning and Development Act 2000 (as amended), that have issued in recent years, as well as the significant differences set out within the renewable (or wind) energy strategies that have been adopted by the various local authorities. Several of the Ministerial Directions issued have directed local authorities to remove certain objectives from Draft County Development Plans due to lack of consistency with National Policies, usually due to the introduction of arbitrary and mandatorily applied development standards e.g. exclusion setback distances.

Brookfield believe that there is considerable merit in moving from a county-by-county to a regional approach for strategic planning for renewable energy. A similar regional approach was previously adopted and implemented for the planning and delivery of critical waste infrastructure in Ireland in the late 1990's and early 2000's. This regional approach used to plan for waste management on a regional basis, provides a very good reference example, which would also greatly benefit electricity infrastructure projects by ensuring that National Policy was fully accounted for in the spatial planning and identification of suitable and unsuitable areas. In this regard Brookfield would encourage the Government to avoid lengthy delays in issuing Renewable Energy Policy and guidelines such as the recent Wind Energy Guidelines which have been over two years in the making and therefore the following statement in the NPF is welcome.

“The development of the Wind Energy Guidelines and the Renewable Electricity Plan (both of which are subject to SEA and AA) will also be prioritised to facilitate informed decision making in onshore renewable infrastructure.”

6.0 Conclusion

The National Planning Framework has the potential to enable an integrated and sustainable approach to renewable energy development supporting sustainable communities, rural development and economic investment across the country.

The inclusion of specific objectives in the National Planning Framework that promote the further development of renewable energy will facilitate the:

- Development of a sustainable plan led, renewable energy industry employing construction and professional service providers and attracting significant capital investment for the across the country;
- Enhance the vibrancy of Ireland as a renewable energy leader;
- Support rural development in a sustainable manner;
- Deliver significant community benefit and commercial rates revenue;
- Provide certainty for investors, developers, planners and the public;
- Provide an incentive for foreign direct investment.

Brookfield wish to thank Department of Housing, Planning, Community and Local Government for the opportunity to engage positively and constructively on these issues and also for the opportunity to highlight the particular importance of this consultation, given the significant implications it has for the continued viability of the renewable energy sector Ireland.

Kind Regards,



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