



IWEA Submission:

Ireland 2040 – Our Plan (National Planning Framework)

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Table of Contents

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|---|--|---|
| 1 | Introduction | 3 |
| 2 | Clearer Vision, Greater Ambition | 4 |
| 3 | Recognise Role and Requirement for Onshore Wind Energy | 6 |
| 4 | Regional Strategic Planning for Critical Electricity Infrastructure..... | 8 |
| 5 | Conclusion..... | 9 |

1 Introduction

The Irish Wind Energy Association (IWEA) is Ireland's leading renewable energy representative body and, as such, it has an active interest in the country's future sustainable energy potential. IWEA is committed to promoting the use of wind energy in Ireland and beyond, as an economically viable and environmentally sound alternative to thermal or nuclear generation. IWEA also promotes awareness and understanding of wind power as the primary renewable energy resource.

Renewable energy development is a vital part of Ireland's strategy to tackle two major challenges facing us today – ensuring a secure supply of energy and combating climate change. Wind energy, in particular, has a key role to play in meeting these challenges. However, IWEA naturally supports proper planning and sustainable development and recognises that development of wind energy projects must take account of other environmental issues, not least the potential impact on local residents and the natural heritage. A balance has to be struck to give appropriate and necessary protection to the local environment, while also considering the State's obligation to do its fair share in the protection of the global environment against the ravages of climate change.

IWEA welcome the opportunity to make this submission to the draft National Planning Framework (NPF) and supports the provisions of the NPF in relation to the renewable energy sector.

It is considered however, that the NPF as a strategic document looking towards the development of Ireland over the next 20 + years, must be more supportive of all forms of renewable energy as we move through the next decades towards a more sustainable model of energy generation and a low carbon future.

It is vital that the NPF includes a stronger national planning policy basis for developing all appropriate renewable energy technologies, and wind energy in particular, to help meet the Government's climate change targets and the State's international obligations. The NPF must provide a very clear policy direction, on how onshore wind energy projects will be required across the State over the lifetime of the NPF to 2040. The NPF must be unequivocal on this, if future regional and local planning policy documents are going to be framed by the NPF.

The NPF must also clearly acknowledge and highlight that a far greater level of renewable energy capacity will be required over the period of the NPF to 2040 than has been delivered to-date, and the NPF must encourage and require that such developments be facilitated in future regional and local planning policy documents, subject to relevant guidance and development control standards.

In summary, this submission highlights the following points:

1. The need for a clearer vision and greater ambition around the transition to a low carbon economy, and how that is going to be facilitated by the NPF.
2. The role and requirement for onshore wind should be specifically recognised and highlighted in the National Planning Framework.
3. There is considerable merit in moving to a regional approach for the strategic planning of wind energy and other critical electricity infrastructure.

2 Clearer Vision, Greater Ambition

Some of the statements and objectives in the Draft NPF relating to energy policy, the transition to a low carbon economy and targets, appear to be slightly misaligned, resulting in ambiguity about what is required and by when. More worrying than the ambiguity, is the fact that the NPF may not convey in strong enough terms, the threat posed by climate change, and the need to quickly transition to a low-carbon economy, and how the NPF must provide the framework for how that transition is going to be facilitated through planning policies in the NPF and other planning policy documents that will sit under the NPF.

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”*

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.”

Other Government policy documents will end up determining how much renewable energy is either required or technically feasible in an Irish context, therefore the NPF should not necessarily limit this ambition. It is also likely that the other Government policies and policy document relating to energy policy will go through a number of iterations and reviews within the period of the National Planning Framework up to 2040. The extracts from Section 8.2 quoted above appear to require a level of renewable energy penetration in excess of those referred to in the extract from Section 9.1 also quoted above. As part of the NPF, references to 40% by 2020, 50% by 2030, etc. could be misconstrued as setting maximum levels permissible, or give the wrong impression that we have ample time to deal with the climate change challenge in the years ahead. All scientific evidence is highlighting that this is clearly not the case and there is in fact, no time to waste in dealing with the causes of climate change and moving to low-carbon societies.

The Draft NPF 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."

While this objective is laudable, the intended means of promotion is not clear from the Draft NPF. The use of the term "towards a low carbon economy by 2050" gives no sense of urgency. As the primary national planning policy document, the National Planning Framework needs to provide a more detail on **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.

3 Recognise Role and Requirement for Onshore Wind Energy

The draft NPF recognises the importance of supporting the renewable energy sector over the lifetime of the plan and makes specific reference to Ireland's obligations in relation to the reduction of greenhouse gas emissions.

In April 2017, the EPA released a report entitled "Ireland's Greenhouse Gas Emission Projections 2016-2035" which detailed that "in terms of the overall 16% Renewable Energy Share (RES) target in 2020, it is expected that 13.2% will be achieved by 2020 based on current progress". The report continues to detail that the renewable heat (RES-H) sector is estimated to have a shortfall in targets of 3% of the overall 12% RES-H target while the transport sector is also estimated to have a 2% shortfall on its 10% target (RES-T).

The most recent EirGrid 'All Island Generation Capacity Statement 2017-2026', reiterated the importance of the role of wind energy and stated that "*Wind provided 22% of all electricity in Ireland in 2016, Hydro generators provided 3% of our electricity needs in 2016*". The report continues to state that "*though there has been some interest in developing solar PV, the future of this sector is unclear, and so modest growth is assumed.*" The report also gives consideration to other forms of renewable development (including biofuels and marine energy) and while it is recognised that these will make an important contribution to meeting these goals, the report acknowledges that renewable targets will be achieved largely through the deployment of additional wind energy generation.

The National Mitigation Plan has clearly acknowledged the importance of onshore wind in terms of renewable energy generating capacity. It states the following in this regard:

"Our electricity system will be one where onshore wind remains a key part of Ireland's generation portfolio out to 2030. Assuming more cost competitive technologies do not emerge in this decade, this is likely to remain the position beyond 2030 and possibly out to 2050."

"To date, wind energy has been the largest driver of growth in renewable electricity. The total amount of renewable generation connected to the grid at December 2016 was 3,120MW, of which wind generation was approximately 2,796MW, hydro was 238MW and biomass was 86MW. Eirgrid estimates that a total of between 3,900MW and 4,300MW of onshore renewable generation capacity will be required to allow Ireland to achieve 40% renewable electricity by 2020. This leaves a further requirement of between 780MW and 1,180MW to be installed by 2020 if the 2020 electricity target is to be reached, requiring an increased rate of installation."

Draft NPF Objective 44 supports the development of "*Ireland's offshore renewable energy potential, including domestic and international grid connectivity enhancements*". The NPF should include a similar objective specific to on-shore renewables, with wind energy being specifically referenced. While there are a number of references to onshore renewables in the text of the Draft NPF, the fact that there is a specific objective relating to offshore renewables but no such objective relating to onshore renewables, could be mistakenly construed as the NPF favouring offshore ahead of onshore renewables. We trust this was not the intention.

While it is encouraging that the Draft NPF recognises the importance of policy support that supports national targets for climate change and identifies the potential role for offshore wind development, it is disappointing that the key role that onshore wind energy plays as part of the overall renewable sector has not been specifically acknowledged or encouraged. This is particularly important when

considering, as outlined above, the significant contribution this sector has made in the past and will make in the future, in the delivery of climate change targets within the life time of the National Planning Framework.

The cost effectiveness of onshore wind development is outlined in a report prepared by Cambridge Economic Policy Associates Ltd, on behalf of the Department of Communications, Climate Action and Environment. The report entitled *“Economic Analysis To Underpin A New Renewable Electricity Support Scheme In Ireland”*¹ details that onshore wind is the lowest-cost form of renewable electricity and states that *“the least-cost (renewable electricity) mix would consist of mostly onshore wind, with some well-located large solar PV”*.

In light of the significant wind resource available to Ireland and considering that onshore wind represents the most viable and realistic technology for reaching the required national targets, it is critical that a strategic and long-term policy document of the significance of the NPF provide clear direction in terms of supporting all renewable energy sources, and onshore wind in particular. This is all the more important considering it is the onshore wind sector that has delivered the largest proportion of carbon savings and renewable energy generation capacity to date, and is one of the few technologies available today which has the capacity and scale to make further contributions in the short to medium term.

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, **onshore renewables and wind energy in particular, must be supported in the NPF with a specific National Policy Objective.**

¹ Link to document published by Department of Communications Climate Action and Environment alongside Design Consultation for the new Renewable Electricity Support Scheme, RESS <https://www.dccae.gov.ie/en-ie/energy/consultations/Documents/28/consultations/Economic%20Analysis%20to%20underpin%20the%20new%20RESS%20in%20Ireland.pdf>

4 Regional Strategic Planning for Critical Electricity Infrastructure

IWEA believe that there is considerable merit in moving from a county-by-county to a regional approach for strategic planning and the identification of suitable and unsuitable areas for wind energy developments and other electricity infrastructure, including electricity transmission lines.

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.

The disparity between the local authorities is not only limited to the application of development standards, but is also evident in the characterisation of landscapes across different Local Authority areas. The variation in such characterisations can result in similar types of landscapes being identified with varying sensitivities or categories of importance, depending on the relative value that each authority places upon such landscapes.

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.

It is envisaged that as part of the enhanced forward planning function of the regional authorities (which is evidenced through the recruitment of additional regionally based planning expertise within each regional authority and the preparation of the Regional Spatial and Economic Strategies (RSES) for each region), planning for the provision of renewable energy projects and electricity infrastructure could be added to their functions. This would allow for the appropriate identification and classification of environmental constraints and opportunity areas on a regional scale, and ensure a consistent approach is taken to development control that is consistent with national policy and guidance.

Having regard to the extent and scope of the NPF, it is considered the NPF should recognise the merits of a regional approach for the strategic planning of renewable energy and electricity infrastructure, and include an Objective to adopt such an approach as a priority.

5 Conclusion

IWEA recognise the complex and detailed process that has been undertaken and acknowledge the work that lies ahead to finalise the National Planning Framework. The authors are to be commended for their efforts to-date.

As the primary national planning policy document, the National Planning Framework needs to provide a more detail on how the Framework's objectives relating to climate change and transition to a low-carbon economy, 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.

It is acknowledged that the Draft National Planning Framework recognised the important role which renewable energy has had and will continue to have in a low carbon future. However, it is contended that the important role that on-shore wind energy has played in helping Ireland meet its climate change targets has not been sufficiently recognised in the Draft NPF.

The National Planning Framework, as the overarching national planning policy must contain additional objectives and commentary to support the continued development of on-shore wind, to ensure that strategic policy support is in place to support the continued development of this abundant renewable energy resource.

Moving to a regional approach for the strategic and spatial planning of renewable energy and other electricity infrastructure, would provide guidance at a more appropriate level than the current county-by-county system. Such an approach would result in a more consistent application of national policy and guidance, and methods for identifying constraints and areas of opportunity. In addition, such an approach would provide an open, transparent and evidenced-based framework to further inform a individual site or route selection process.