

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

10 November 2017

Our ref: HFLD NPF  
Your ref:

**Re: Stage 2 Draft National Planning Framework (NPF) Submission**

Dear Sir or Madam,

Highfield Energy is an indigenous Irish company founded to develop, construct and operate utility scale renewable energy projects on the island of Ireland. Highfield Energy is a member of the Irish Wind Energy Association (IWEA) and the Irish Solar Energy Association (ISEA) and we wish to support their submissions on the NPF.

Additional to our support of our representative bodies, the founders of Highfield Energy have been involved in the planning and development of renewable energy projects in Ireland for over 10 years and are keen to highlight the importance of strong policy statements within the NPF relating to the development of renewable energy projects in Ireland. To this end we wish to make a short, high level, submission focused on some of the renewable energy related matters contained within the plan.

We are currently in a phase of enormous change to energy systems globally and we must make sure that the NPF seizes the opportunity to be forward looking enough to place Ireland as a leader in the transition to a low carbon energy system. Apart from the obvious climate change objectives we must view the necessity to transition to renewable energy sources as an opportunity. The NPF is a key policy element in enabling this transition. An effective transition could have tremendous benefits in terms of attraction of investment to Ireland, long term economic benefit to the country and to consumers and health and environmental benefits.

***National Policy Objective 49:***

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

We agree with Policy Objective 49 and encourage the use of strong unequivocal objectives such as this. Provision of electricity grid infrastructure of all forms is a fundamental enabler of our transition to a low carbon electricity generation system and it is vital that this objective is strongly articulated in the NPF. The discourse in the draft document around this objective discusses security of supply but we would also note that in the context of the European

target model for electricity market integration that interconnection in particular should also deliver economic benefit and value for the consumer in terms of electricity price.

We note the statement in the “Transition to Sustainable Energy” outcome summary that the transmission network should be reinforced. It should be made clear that this refers to the electricity network both transmission and distribution and this should be incorporated into Objective 49 so there is no doubt that this is referring to all electricity grid infrastructure and not just interconnection.

***National Policy Objective 55:***

*Support the circular and bio economy through greater efficiency in renewable resources and land management and by reducing the rate of land use change from urban sprawl and new development.*

We note the ambition to put in place a framework for sustainable development and management of our land resource. Given the fundamental shift that will occur in our energy systems and energy production over the next 30 - 40 years we would request that a stronger statement regarding land use for renewable energy projects in particular onshore wind energy and ground mounted solar PV is linked to this policy objective. Land will be required for these projects and they will be vital contributor to the sustainable circular economy.

It is important to note that as with all other developments in the built environment energy projects in Ireland do not have a “blank canvas” to work with. While other projects such as housing, schools or hospitals work with constraints of services and transport infrastructure that are well understood by stakeholders electricity generation projects are bound by all of these constraints but also the constraints of the existing electricity grid infrastructure and resource availability which is often less well understood by stakeholders. The objectives around land use change must acknowledge that if renewable energy projects are to deliver value for all they may often be bound by technical constraints that will have a significant bearing on suitable locations to develop these projects.

***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.*

If we are to make progress towards a low carbon economy the promotion and positive disposition towards renewable energy projects will be a vital element of the complete policy framework that relates to planning and energy development in Ireland. We note the 80% reduction in greenhouse gas emissions by 2050 target and we would point out that to date (as recently highlighted by the presentations at the Citizens Assembly meetings on climate change) that Ireland could not be considered a leader on climate change and it looks likely that we will miss our 2020 renewable energy targets. While a long term ambitious target is essential we suggest that further interim targets should be set and included in the NPF (in particular within the timescale of the NPF itself) to drive their adoption through the other relevant policy.

We note that there is reference to further renewable energy targets in the “Transition to Sustainable Energy” outcome summary and as a minimum these should be restated and it should be made clear that an objective of the NPF is to facilitate these targets as a minimum.

The requirement for the “Legal and regulatory frameworks to meet demands and challenges in transitioning to a low carbon society” is included in the discourse leading to this policy objective and we would highlight this point and request that further detail and targets around streamlining planning and development, environmental and electricity regulation legislation should be prioritised to accommodate renewable energy development in Ireland.

**National Policy Objective 61:**

*Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, green infrastructure planning and innovative design solutions.*

The change of transport to the use of electric vehicles is gathering pace. Due to our size Ireland is an ideal country to take advantage of this developing technology on a large scale within the next 20 years. If the electricity that supplies this transport fleet is sourced from renewable energy generators the benefits in terms of air quality and reduced exposure to pollutants in our urban areas would be significant. We support the inclusion of this objective and we would consider that the key to success in this matter for the transport element is linked back to the energy that is used to power that transport.

Many thanks for taking into consideration our submission on these matters.

Yours sincerely,

[Unsigned, via email]

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Gavin Jones  
Director  
Highfield Energy Limited