



**National Planning Framework
Element Power Ireland
Response to Ireland 2040 Our Plan Issues and Choices**





Introduction and Executive Summary

Element Power Ireland (EPI) welcomes the opportunity to make this submission on the National Planning Framework (*the "NPF"*). The Department of Housing, Planning, Community and Local Government (*the "Department"*) is to be commended for issuing this consultation that will help form the overall plan for Ireland up to 2040. It is recognised that the NPF identifies a number of issues facing Ireland, however EPI, as a renewable energy business, will focus its response on the energy related matters raised in the consultation.

EPI has already made a lengthy submission to the initial NPF consultation and as such does not propose to reiterate all the points it made in that submission again.

EPI is a member of the Irish Wind Energy Association (IWEA) and EPI supports and endorses the submission that IWEA has made to this consultation in all aspects. As such EPI will not reiterate the points made in the IWEA submission with respect to a request for greater ambition and recognition in the NPF for onshore wind which has made a significant contribution to Ireland's decarbonisation of its electricity system to date. Furthermore EPI agrees with IWEA's position that onshore wind, as the cheapest form of renewables generation in Ireland, has a key part to play in the future as Ireland continues on its transitions to a low carbon economy by 2050.

EPI believes strongly that a plan led approach is required to ensure the successful delivery of key infrastructure for Ireland such as its energy infrastructure. Energy infrastructure can take years to develop and is usually in place for at least two decades once constructed so it is important that much thought is given to the need for, the suitability of, and the location of this key piece of national infrastructure. Plans such as the NPF can set the high-level policy required to ensure successful delivery of the appropriate technologies in the appropriate locations. EPI is heartened that key criteria such as Climate Action, Air Quality and Sustainability are key themes throughout the NPF, as these are not alone major concerns facing Ireland, but indeed will be key themes for all countries globally over the period that the NPF is to be in place for.



Further Comments in addition to IWEA's Submission

As stated EPI endorses the IWEA's submission but would make the following points in addition to the points made by IWEA.

1. Inter-departmental Consultation and an Overall Joined up Plan

Renewable electricity projects of large scale are largely influenced by the policies of two Government Departments, the Department of Housing, Planning, Community and Local Government and the Department of Communications, Climate Action and Environment (DCCAE).

It is noted that the DCCAE are currently consulting on the Renewable Energy Policy and Development Framework (REPDF) which seeks to identify areas for large scale renewable energy projects (>50MW). Also it is noted that the Wind Energy Development Guidelines 2006 (WEDG 2006) are the subject of an ongoing targeted review process.

In preparing the NPF, the two Departments are trusted to actively engage together on the targeted review of the Wind Energy Guidelines for Planning Authorities and the implementation of REPDF to ensure the NPF will be consistent with both of these documents once published. It would be futile to publish the NPF, only for it to be superseded or undermined by a future revision of the Wind Energy Guidelines or REPDF. Renewable electricity projects of large scale can be many years in pre-planning and planning stages, and require consistent Frameworks and Guidelines to ensure the projects can be delivered to meet the country's needs. In addition, the Commission for Regulation of Utilities (CRU) and EirGrid are currently consulting on the future grid access regime which when concluded will set out the future policy for connection to the national grid infrastructure in Ireland.

In this regard it is recommended that a number of workshops between the two Departments, CRU and EirGrid would be beneficial to ensure an overall joint up policy approach to developing any strategic areas. Furthermore, the DCCAE is also consulting on the development and design of the new Renewable Electricity Support Scheme (RESS). In a technology neutral auction process, onshore wind will act as a key player and will be competitive as a lowest cost of technology. It is important that the Draft National Planning Framework recognises the important role that onshore wind will continue to play in Ireland's generation portfolio and in helping Ireland meet its climate change targets.



2. Reform of the Planning System

Recent events with the €850 million Apple datacentre in Athenry have highlighted issues, planning risks and delays associated with the current planning system in Ireland for infrastructure projects. It is noted that the Government have committed to including any future datacentre applications under the Strategic Infrastructure Development (SID) process in an effort to ensure that these planning applications will be decided in a timelier manner. However it should be noted that SID applications do not have a mandatory timeline for when a planning decision has to be made. EPI requests that statutory timeframes for decision making that already apply to Planning Authorities, and in the Strategic Housing Development section (SHD) should be extended to all SID applications being considered by an Bord Pleanála and all planning appeals that an Bord Pleanála is responsible for.

In addition EPI would like to point out that it can regularly take 12+ months to determine whether or not a project constitutes SID before an application for permission can be submitted. There is a definite and set criteria as to what constitutes an SID project set out in legislation, which should allow the SID Determination process to be completed in a very shorter period of time.

Furthermore many SID projects have been refused planning permission for reasons that could and should have been identified much earlier in the process such as inappropriate site selection (e.g. the first National Children's hospital application), a lack of planning policy (some wind farm SID applications), or the expectation to follow new requirements or guidelines that had not been identified earlier in the process (e.g. new best practice guidelines for surveying or assessment). As such EPI suggests a formal pre-application process akin to that now in place for the Strategic Housing Development (SHD) should be introduced for all SID applications requiring An Bord Pleanála to engage with applicants, the local Planning Authority and other Statutory consultees on a formal basis as per the SHD process.

The European Commission report '*Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions*' published in February 2017 provides a comprehensive overview of renewable energy deployment in the EU and progress towards meeting the 2020 targets. The report states that the vast majority of Member States are "*well on track in terms of renewable energy deployment*" however four Member States, of which Ireland is one are currently projected not to meet their national binding targets. It is important that renewable energy developments which can contribute to meeting national renewable energy targets progress through the planning process in an efficient manner through the use of a robust and efficient planning system.



Conclusion

EPI is grateful for the opportunity to make another submission on the NPF and is encouraged by this step by the Department to put in place a National Planning Framework as an update to the National Spatial Strategy. EPI encourages the Department to adhere to and achieve its projected timeline for implementing this plan.

Yours sincerely

A handwritten signature in black ink, which appears to read 'Kevin O'Donoghue'. The signature is fluid and cursive, with a long horizontal stroke at the end.

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