

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

30th March 2017

Re: Consultation on National Planning Framework (NPF) 2040 & the associated Strategic Environmental Assessment Scoping Report on the NPF.

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 Ireland is part of Brookfield Renewable, one of the largest publicly-traded renewable power platforms operating across Europe, North America and South America. Its portfolio primarily consists of hydroelectric and wind facilities totalling more than 10,700 MW of installed capacity and is diversified across 15 power markets in 7 countries.

Brookfield Renewable owns and operates one of the largest renewable energy portfolios on the island of Ireland. The Irish portfolio consists of 350 MW of operating wind capacity across 19 wind projects in 9 counties. Generating energy for approximately 224,000 homes and employing close to 100 people in Cork.

Brookfield believes that renewable energy represents the one of the greatest opportunities for Ireland not alone in progressing to a low-carbon economy, promoting energy sustainability, improving security of supply and air quality but also in providing a significant economic boost through job creation, commercial rates, community benefit and attracting inward foreign investment. Ireland has an abundant, diverse and indigenous renewable energy resource which provides a sustainable and economic opportunity for the country. The ready availability of a renewable energy supply source is increasingly becoming one of the core attractions for inward investment of large organisations such as Facebook, Google, Amazon and Apple. 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 welcomes the opportunity to make a submission at this stage and looks forward to engaging constructively throughout the National Planning Framework process.

2.0 National Planning Framework- Issues and Choices Report

In general Brookfield support the positive statements contained within the *NPF Issues and Choices Report* which include the following statements in relation to renewable energy generation;

“There will be a need to adapt to climate change and meet targets for emissions reduction, energy efficiency and renewables, with a view to a low carbon and climate resilient sustainable Ireland by 2050.”

“Prioritise the development of infrastructure that can deliver national benefit – including renewable energies;”

An overarching National Planning Framework is a key component of any Planning Policy. Brookfield would suggest that the National Planning Framework should be drafted such that regional and local plans that sit underneath this Framework unambiguously align with national policies, frameworks and strategies set out in the NPF. The hierarchy of NPF in relation to Local and Regional Plans should be explicitly stated and their application ensured by appropriate mechanisms.

2.1 Planning System and Renewable Energy

The following statements are contained within the NPF with regards to the planning system;

“Harness the planning system in order to maximise the role it can play in relation to climate change and renewable energy obligations;”

“Manage the planning and development process so that the right development occurs in the most suitable places and at the right time, ensuring sustainability and best use of scarce resources.”

Given the contribution of renewable energy to combating climate change, we would welcome the inclusion of the requirement for accommodating renewable energy targets within the NPF. Brookfield agrees with the option set out in Section 5.3.7 of the framework *“to create Strategic Energy Zones or Corridors”*. The preparation of a clear strategy, targets and identification of geographical areas where wind energy development is encouraged or permissible is necessary to ensure clarity for all parties. This provides a greater degree of certainty for the wind industry and, indeed, for local residents and other local groups. It also provides clarity for Planning Authorities to facilitate the proper planning and sustainable development of areas. However these classifications should be based on clearly defined and measurable methodologies and provide a consistent approach to plan-led development. Brookfield would suggest that the National Planning Framework should include strategic level guidance on locations for renewable electricity projects, which will take precedent over existing county development plans, and inform future regional and local planning policies.

Brookfield recommends that the National Planning Framework could set the high-level policy for identifying such Strategic Energy Zones and that the detail in terms of actually identifying such zones could be managed at a regional level to help ensure consistency across the country. Brookfield understands that the regional planning policies are currently being reviewed in tandem with this consultation and as such it could be an opportune time to put such a structure in place.

3.0 Strategic Environmental Scoping Report- National Planning Framework

In relation to the Strategic Environmental Assessment Scoping report Brookfield have the following comments;

Brookfield agree with the following statement in the NPF SEA under Section 5.3.5 Air Quality;

“Maintain and promote continuing improvement in air quality through the reduction of emissions and promotion of renewable energy and energy efficiency. “

We agree with the statement in the NPF under Section 5.3.6 Climatic Factors;

“A key consideration in relation to the NPF is in relation to planning for climate change into the future. This is both in terms of planning for predicted effects of climate change e.g. avoiding flood risk areas; and also ensuring that Ireland’s commitments to move to a zero carbon economy by 2050 are supported by land-use policy decisions now e.g. degree of fossil fuel car dependency.”

However we would add as an example here fossil fuel energy dependence and the requirement for renewable energy to offset same.

In NPF SEA Section 5.3.6 Climatic Factors under the heading *“potential significant environmental Issues for consideration in the environmental report”* an opportunity is identified as follows;

“Enhance renewable energy offering”

while this is welcomed by Brookfield we would be concerned that this fails to translate into the Draft SEA Objective and Targets with only a reference to renewable energy in transport. We would suggest that a specific target could be added here also in relation to renewable energy in electricity generation. Renewable energy transport specific targets are referenced twice in the Target section (SEA Section 5.3.6) however no reference is made to specific targets on renewable energy electricity generation in line with agreed EU mandatory targets as follows;

Ireland’s mandatory target under Directive 2009/28/EC is for renewable sources to account for 16% of total energy consumption by 2020. Ireland's National Renewable Energy Action Plan sets out how Ireland intends to achieve this binding national renewable energy target of 16% with renewable electricity (RES-E) to account for 40% of total electricity consumption by 2020. In Autumn 2014, Ireland agreed to new binding EU 2030 energy targets, which proposes to achieve a 40% reduction in greenhouse gas emissions by 2030 relative to 1990 and a binding EU wide target for renewable energy of at least 27% by 2030. These targets require that renewable energy will be a critical and growing component of Ireland’s energy supply to 2020 and beyond. Failure to meet these binding targets will result in EU sanctions.

Brookfield

In Section 5.3.7 Material Assets a shift towards intensification in renewable energy sectors is identified as a challenge however Brookfield would also like to see Renewable Energy generation identified as an Opportunity in the preceding paragraph as there are many potential benefits for Ireland in developing this aspect of the “green economy” including job creation, security of energy supply, reduction in greenhouse gases, attraction of foreign direct investment not to mention hitting our mandatory EU targets.

Table 7.1 Draft SEA Environmental Objectives Under Air Quality Objective 5 (11) states the following;

“Maintain and promote continuing improvement in air quality through the reduction of emissions and promotion of renewable energy and energy efficiency. “

While we welcome these broad measures this fails to translate into a specific target in relation to renewable energy generation e.g. reference to our mandatory EU targets of renewable electricity (RES-E) to account for 40% of total electricity consumption by 2020 eventhough specific reference is made in table 7.1 to transport. Brookfield would suggest adding reference here to our binding targets and providing a supportive state in respect to same with regards to the renewable electricity generation’s role in improving air quality by offsetting fossil fuel energy generation.

Again in relation to Table 7.1 Objective 6 under Climatic Factors no reference is made to renewable energy/electricity generation. Brookfield would encourage a target referencing our EU mandatory renewable electricity targets to be included in table 7.1 under the targets set out under Objective 6. In relation to Table 7.1 under Material Assets Brookfield would encourage the inclusion of a specific reference to renewable energy infrastructure and general support of same as key player in progression to a low carbon economy.

4.0 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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