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Electricity Association of Ireland Response to Draft Revised  
National Planning Framework

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Draft First Revision to the National Planning Framework

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## Observations:

### 7. Realising our Island and Marine Potential

**Chapter:** 7. Realising our Island and Marine  
Potential

#### Introduction

The Electricity Association of Ireland (EAI) welcomes the publication of the draft revised National Planning Framework (NPF). We acknowledge the importance that this document holds in setting out the high-level principles of planning development in Ireland and we welcome the opportunity to respond to this draft.

As this may be the last opportunity to revise the NPF with a realistic chance for installations to be delivered before 2030, it is critical that this framework creates the overarching blueprint to facilitate renewable energy development. The delivery of such projects will determine whether Ireland achieves our 2030 renewable energy and emissions targets. Delays in the planning system have been obstacles to the development of renewable energy projects as well as the connection assets necessary for their operation. Therefore, in addition to the planning reform legislation that is yet to be adopted, the EAI seeks that the NPF prioritises the expedited development of energy and energy related projects that will aid Ireland to be a renewable energy leader.

Having analysed the framework, the EAI wishes to outline a number of areas which could benefit from further consideration. These areas are focused on chapters 7 and 9 of the draft framework related to:

- Offshore Renewable Energy
- Grid & Connection Infrastructure
- Repowering
- Regional Renewable Electricity Capacity Allocations

#### Offshore Renewable Energy

EAI welcomes the update to the NPF supporting the 5GW target of offshore wind by 2030, however the additional 2GW target for non-grid connected offshore wind generation (to accommodate commitments under the Sectoral Emissions Ceiling) is not mentioned. The NPF should include this target as it is important in the context of accelerating both onshore and offshore infrastructure for increased levels of renewables. Additionally, this will stimulate innovation in hydrogen, e-fuel and other net zero technologies to provide a route to market for this non-grid connected generation.

Furthermore, clustering substantial energy demand to optimise the use of our extensive offshore resources should be facilitated in the revised NPF. This strategy would support a government-led approach aligned with the National Marine Planning Framework and guarantee that offshore projects are developed to meet the increasing demand for renewable electricity onshore.

**Attachments:**

DHLGH-C1-203-358 - 20240912 EAI Response to Draft Revised National Planning Framework.pdf

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## **9. Climate Transition and Our Environment**

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### **Grid & Connection Infrastructure**

The EAI welcomes the repeated commitment in several of the policy objectives to supporting grid infrastructure development. The EAI believes that connection assets are as equally important as renewable energy projects, and

that an electricity grid fit for the future must be delivered in a timely manner.

The EAI believes that the NPF should include a commitment to support anticipatory grid infrastructure projects. Such an approach would be similar to ESBN's "Build once for 2040" concept. Under this concept, the NPF would support the development of major grid infrastructure projects that have the capacity to be used well into the future where demand loads will be much greater than they are now. Such ambition is critical to building the necessary "no-regrets" network infrastructure as soon as possible to a scale that can handle future demand and generation. This view mirrors a recent "Grids for Speed" report from Eurelectric focused on how European countries can deliver a grid network capable of facilitating our climate ambitions.

This comprehensive report profiled each EU country individually and evaluated the level of investment required to deliver a grid network fit for the future. As outlined in the report, Ireland will need to invest over one billion euros per annum from 2025 to 2050. While this is a significant level of investment, savings can be achieved via appropriate strategic grid development planning especially through supporting anticipatory grid development. The EAI encourages the Department to consider this Eurelectric report and assimilate such concepts into the NPF.

Grids for Speed Report May 2024: Grids for speed - Eurelectric Power Summit 2024

### **Repowering**

EAI welcomes the reference to the repowering of existing renewable energy plants in the NPF review. We believe a National Policy Objective on repowering should be included in the NPF. Such an objective would emphasise the importance of repowering and life extensions for renewable energy projects thus requiring local authorities to support such initiatives where they meet planning / permitting conditions. Recent European Commission initiatives identified and legislated for the repowering of existing renewable energy projects as a means to quickly boost renewable energy production. This approach reduces gas consumption and has minimal impact on both grid infrastructure and the environment.

Under the revised Renewable Energy Directive, Member States are required to identify "renewable acceleration areas" to simplify and accelerate permitting for repowering. As highlighted in the document, repowering of existing projects allows for the ongoing use of brownfield sites boasting considerable renewable energy potential. This lessens the 1 Eurelectric need to allocate new locations for renewable energy projects. Conversely, decommissioning these developments would significantly diminish the existing renewable energy capacity, exacerbating the challenges within the energy sector.

### **Regional Renewable Electricity Capacity Allocations**

The EAI welcomes the ambition outlined in Chapter 9 of this revised NPF especially in terms of delivering for 2030. The introduction of this structure is essential in aligning regional and local plans for the timely delivery of 2030 targets. However, from our analysis of the targets set out in table 9.1, it is unclear what methodology was used to calculate these targets for each specific region. We seek that the Department clarify how these capacity allocations were calculated.

Regarding the allocations, the EAI view that these targets should be the baseline and not a cap. From experience within the industry, there will naturally be a level of attrition between lands zoned as open for renewable energy development and those actually built. The reason for attrition can vary greatly including landowner intention, to resources on the site, to grid connection availability, to success in renewable support scheme auctions, to refusal

of planning consent, to ability to raise finance or expertise to build the project. Thus, if the capacities indicated in the document will only deliver our 2030 targets if all of the MWs are built then natural levels of attrition risk overall policy failure.

Additionally, the EAI would welcome further detail as to whether there is flexibility within these targets. For example, there may be more scope to produce more solar energy in certain regions of the country, while wind energy may be more appropriate for other regions. In such a scenario would one region be able to over deliver for a certain category if there were shortfalls in other regions? This further highlights the need to understand the methodology employed in creating these targets.

Alongside setting regional renewable electricity capacity allocations, it is essential to establish a direct link between the availability of sufficient grid infrastructure and the achievement of these goals.

**Attachments:**

DHLGH-C1-203-444 - 20240912 EAI Response to Draft Revised National Planning Framework.pdf

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**Boundaries Captured on**            No  
**Map:**