

Bord na Móna

Consultation on the First Revision to the National Planning Framework

Consultation Response

12 September 2024



1. Introduction

Bord na Móna (**BnM**) welcomes the opportunity to respond to the Consultation on the First Revision to the National Planning Framework (**NPF**). As a commercial semi-state company, we manage our landbank of 80,000 hectares to support government policy delivering economic, societal and environmental benefits for the Irish state. Following the cessation of commercial peat harvesting BnM has transitioned to one of Ireland's leading climate solutions companies.

The focus of BnM long-term strategy is on supporting the transition to a net-zero society by 2050 in line with government commitments. We are committed to developing the energy projects required by Ireland to achieve this and we have a large portfolio of energy projects under development covering onshore and offshore renewables, flexible gas generation and new technologies to provide low carbon system services. We are also seeking to develop new industrial clusters located close to our developments to help decarbonise Ireland's industrial customers and provide additional economic benefits to the communities we are part of.

Reaching net-zero for Ireland is a transformative change and requires a holistic assessment of how it can be delivered. The NPF plays an important role in directing where investment occurs. In reviewing the NPF and assessing its compatibility with other government policies we are supportive of much of the revisions, especially the acknowledgement of EU initiative to reduce permitting timelines for renewable investments. We have provided detailed commentary on the NPF below but would like to draw attention to some areas we feel are of particular importance:

- Regional Renewable Electricity Capacity Allocations – capacity must be allowed for projects to not progress to completion. Delivery of the targeted deployment volumes in the Climate Action Plan (**CAP**) 2024 will require far more projects to go through early-stage development.
- Permitting timelines – BnM are very supportive of the European initiatives to reduce the time required to process permitting requirements for renewable energy developments such as planning permission and grid connection offers. We believe these are essential to achieving Ireland's ambitious targets for deployment of renewable capacity by 2030.
- We welcome the acknowledgement that peatlands suitability for the generation of energy most notably wind and biomass. It would be helpful if this was reflected in an objective within the NPF to ensure that this translates into regional and county development plans.

One overarching observation that should be made in regards the NPF is that in the emerging 2023 Planning and Development Bill the plan-making process is to be extended from six years to ten years. While the Draft Bill allows for the continuation of current County Development Plans (**CDP**) until reviewed (whereby the 10-year cycle will begin), changing policy such as the acceleration of renewable development within the NPF with the supporting policies will be delayed significantly (2028-2030 for new CDPs) until the Plan is to be amended, thereby undermining key 2030 targets. The next available time for CDPs to be updated is following the revision and approval of each new Regional Spatial Economic Strategy (**RSES**).

We hope that our suggestions are helpful in the process of revising the NPF and would be happy to provide further commentary on any of the comments raised.

Regional Renewable Electricity Capacity Allocations

BnM are supportive of the principle of setting regional renewable capacity allocations and hope that they will help deliver on the ambitious government targets for renewable generation. In their implementation we would like to highlight three important points:

1. To successfully deliver on their targets the regional assemblies need to allow for the development of a greater volume of new generation than will be delivered. For example, to deliver the 1,966 MW of additional capacity in the Eastern and Midlands Regions, initial plans should allow for initial development of a much greater volume in the expectation that many will not achieve operation. In the development cycle of a wind farm, it is expected that some will not progress to completion. This is driven by many reasons; unexpected planning constraints may arise; grid connections may not be available and a commercial case for the development of the project may not exist. The primary financial route-to-market of future renewable generation in Ireland will remain the Renewable Electricity Support Scheme (RESS). The competitive nature of the RESS auctions is intended to lower overall consumer costs but to succeed in lowering costs it is necessary that some projects win and lose.
2. How regional capacity allocations translate to county targets and development plans needs to be carefully considered. Flexibility in the delivery of different technology types and volumes across counties will be required. Available resources and factors such as electricity grid development will determine where projects can be developed and be commercially viable.
3. It is not BnM position to comment on MW targets for local authorities as BnM feel that it is not the ideal vehicles to transpose the required level of MW to deliver the ambitious targets for 2030. Notice needs to be given to the process that will deliver the 2030 targets and were developments can be stalled or not delivered. This attrition rate needs to be highlighted in any development process at both a policy and practicable level. By attrition rate it is meant, failed planning applications, due to various reasons, inability to achieve a grid connection, or the project not being commercially viable due to changes in market dynamics or policy during the development time. A more practical approach to take would be to align policy across the policy framework and select counties to deliver several renewable energies development across the plan period. However, if there is still a desire to push MW hours as the ideal barometer then we believe the MW figures need to be significantly higher.

Policy Alignment

BnM welcomes the acknowledgement of the REPower EU and RED III legislative proposals within the NPF. The goal of shortening the permitting process to one year within acceleration zones and two years outside of those areas is challenging but we believe critical to achieving our 2030 targets. We are aware that achieving this will be challenging and will require alignment between County and National Development Plans to ensure that decision making processes as stated above reflect the intent of EU policy. Following the adoption of the revised Renewable Energy Directive, the Commission implemented an ambitious plan (Accele-RES) to assist Member States in the transposition and implementation of the new obligations. An important tool resulting from the Accele-RES plan has been the creation of an online Q&A website where the permitting experts of Member States can directly ask questions regarding the implementation of the permitting provisions.

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Secondly, while it is understood that the Regional Spatial and Economic Strategies (RSESs) must be revised once the draft NPF is completed (and CDPs to be updated once each RSES is finalised), it is requested that consultation through Accele-RES is undertaken by all permitting experts working on the NPF, RSESs and CDPs to ensure that the content from REPowerEU and associated amended Directives / emerging legislation is implemented at plan level. This consultation should also examine the mechanisms required to allow an insertion of REDIII transposition of accelerated timelines for renewable energy projects into Regional and County level plans.

Grid Considerations

Further development of the electricity grid has been acknowledged as a key enabler for Ireland to achieve the transition to a low carbon economy. Development of new distribution and transmission grid infrastructure will be central to this. However, it is also important that other potential solutions are explored and allowed for within the NPF. There is significant electricity demand growth expected among industrial customers categorised as Large Energy Users in the coming decade. Location of this new demand in proximity to current and future renewable generation will minimise the need for investment in grid assets. Policies to encourage this co-location are being developed as part of the Commission for Regulation of Utilities review of LEU connection policy and have been raised as part of the DECC's private wires consultation. We believe that this should be accounted for within the NPF to ensure that development of new industrial areas, renewable generation and supporting infrastructure is optimised.

Climate Action and Biodiversity

In line with other reference points outlined within this document a more holistic approach needs to be taken regarding climate action and biodiversity. We support the proposals in the NPF with regards to Strategic Planning for Biodiversity. The wind energy sector, both onshore and offshore, has a particular interest in achieving these goals in regard to climate action. It would be beneficial for a link policy to be implemented into the NPF that reflects the objectives and or policies of the road map for the Climate Action Plan 2024 and the additional policies/objectives that are listed within the annex of actions.

The wind energy sector can be leaders in halting biodiversity loss and BnM hope to play a central role in this due to our centralised nature and the area of land that we manage. The Biodiversity Action Plan promotes the need for a whole of government and society to play a role in reversing biodiversity loss. The NPF where possible should support and reflect the policies and objectives that have been adopted within the Biodiversity Action Plan for the period 2023 – 2030.

With regards to the NPF we fully support objective 85 "In line with the objectives of the National Biodiversity Action Plan, planning authorities should seek to address no net loss of biodiversity within their plan making functions". BnM make efforts to ensure that in each of our renewable energy

developments we achieve this goal and believe that this should be further encouraged across the industry.

Offshore Renewable Energy

Ireland's marine area has huge potential for renewable energy generation and offshore wind is expected to have an important role achieving net zero. While still in the early stages of development a long-term plan led strategy for the development of the sector has been established in the last few years. Clarity in how the National Planning Marine Framework and National Planning Framework will be applied together (or separately as relevant) in the plan-led decision-making process would be welcomed. BnM hope to see alignment between both terrestrial and maritime plans, policies and associated decisions.

BnM support the addition of National Policy Objective 49 and the South Coast DMAP processes as referenced as the case study (c. page 105). However, in the absence of a national spatial strategy or development plan for ORE, there is a need for clear national policy and suite of ORE planning guidelines that will be essential to avoid a patchwork of differing policy objectives, requirements, expectations applying across different DMAP areas as regional plans are developed over time. We would recommend that Policy is accelerated to designate further DMAP areas for ORE, particularly on the East coast which is proximate to the majority of our energy demand, and which is forecast to grow significantly in the period to 2040.