



National Planning Framework Consultation

Submission from the Sustainable Energy Authority of
Ireland

12 September 2024



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Introduction

As Ireland's national energy authority, the Sustainable Energy Authority of Ireland (SEAI) provides advice and technical support for national energy policy development and delivery. As an Agency under the aegis of the Department of the Environment, Climate, and Communications (DECC), we play a leading role in ensuring the goals of the All of Government Climate Action Plans are achieved in helping Ireland reach net zero emissions by 2050. We are responsible for delivering a range of energy programmes designed to achieve these objectives. Informed by our analysis and modelling, SEAI provides advice to Government for policymaking, while continually monitoring energy trends and market developments to ensure that Ireland remains on track to achieve its climate and energy goals.

Context

SEAI welcomes the opportunity to provide views on the National Planning Framework (NPF) Consultation. Climate action urgency, resourcing, and placing climate at the heart of Government programmes and policies are essential considerations for the next National Planning Framework. We welcome the NPF's plan to implement strengthened, more environmentally focused planning at local level, in order to manage growth in the context of Ireland's existing international and EU obligations and commitments.

It is SEAI's view that critical to the plan for shaping the future growth and development of our country out to the year 2040 are the following key considerations;

- **Urgency** of climate action, as reflected in Government's targets and ambitions and plans;
- Ensuring that climate action is sufficiently **resourced** to give Ireland the capacity to drive the massive shifts in energy systems and societal change needed;
- Wider reform and **reframing of economic and social goals**, placing climate at the heart of Government programmes and policies;

Unfortunately, despite recent progress in some areas, Ireland is already behind on living within our carbon budgets and achieving the 7% per annum emissions reduction. National emissions targets require transformative change across all sectors. This means a levelling-up across the economy to increase the probability of achieving our 2030 and 2050 targets. Meeting these targets will require planning, people, and implementing significant action, and will only be possible if we increase the capability and skills base within the Irish economy, both in the public and private sector, and integrate this consideration within the National Planning Framework.

The challenge is significant, but there is also huge opportunity from a societal, business, and development perspective. This multi-sectoral transformation is likely to necessitate reflection and change in the manner which Ireland delivers on major investment, and discussion regarding how we activate desired societal change through the National Planning Framework.

Chapter 1: The Vision

SEAI comments under each of the 10 “National Strategic Outcomes”

1. Compact Growth

- We are adding problematic fossil fuel demand in Ireland across sectors, such as in the sales of bigger homes, SUVs, fossil fuel vehicles, and increased unsustainable economic output in sectors fuelled by fossil fuels. If left unchecked, this will make it impossible for us to reduce our carbon emissions and meet our climate targets.
- SEAI supports sustainable planning, including the development of compact, low-carbon urban areas that reduce energy demand through public transportation, systems, green spaces, and adjacent public and social services.
- In the context of the future growth and development of our country, decarbonising our energy system is critical. This will require decarbonising heat, electricity, and transport, supported by a proportionate and rapid response in enabling policies, regulatory provision and competency and capacity development; including around;
 - District heating
 - Electrification of heating
 - Retrofit and addressing barriers with regard to decarbonising the built environment
 - Facilities to support and enhance modal shift to active and public system travel including localisation of amenity and services

2. Enhanced Regional Accessibility

- SEAI’s position as the National Energy Authority is that future investments as part of enhanced regional accessibility should be focused on public transport and rail networks rather than on roads.
- SEAI welcomes the focus on public transport and sustainability mobility outlined in the NPF and calls for further focus on cutting car dependency. In particular SEAI acknowledges;
 - The NPF plan to strengthen public transport connectivity between cities and large growth towns in Ireland and Northern Ireland with improved services and reliable journey times, based on the findings of the Draft All-Island Strategic Rail Review Public transport networks.
 - The commitment to prioritise modal shift in urban areas, where possible, to enable the efficient use of the national road network, in particular for commercial traffic.
 - The key role cycling will play in enhancing regional connectivity.

3. Strengthened Rural Economies and Communities

- SEAI has long promoted a revolution of Ireland’s energy system to one based on efficient use of locally generated renewables.

4. High-Quality International Connectivity

- By increasing indigenous supply and distributed energy production, the exploitation of renewable energy relies upon the development of new infrastructure.
- This infrastructure incorporates many technologies whose output is sensitive to prevailing weather conditions and may furthermore be affected by future climate change.

5. Sustainable Mobility

- We are adding problematic fossil fuel demand in Ireland across sectors, such as in the increasing sales of fossil fuel powered vehicles, and we need to reduce our vehicle dependency. SEAI supports planning policy that prioritises modal shift with public transport, cycling and walking over car use.
- SEAI recommends the inclusion of policy for the electrification of transport including electric vehicles, buses and rail systems supported by the charging network and infrastructure required that is powered by renewable energy.

6. A Strong Economy, supported by Enterprise, Innovation and Skills

- Ireland is experiencing population and economic growth. This growth must be strategically aligned to our climate targets. At present our growth in energy demand is outpacing our installation of renewable energy. Zoning and strategic planning to support our economy should focus on sustainable growth, and in areas that benefit Ireland's communities and economy in support of climate targets.
- Ireland's climate ambition will require collaboration across the economy as we eliminate fossil fuels through systemic change.
- Future investment choices must deliver upon the National Climate Action Plan and our targets to 2030 and 2050.

7. Enhanced Amenities and Heritage

- We need to focus on protection of our built environment heritage while ensuring this stock is not left behind in retrofitting efforts. It is imperative that our heritage buildings are protected in the long term in means that ensures they are efficient in their energy use.
- Amenities and services in local areas are important to support modal shifts in transport, contributing to reducing the requirements to travel longer distances in personal vehicles.

8. Transition to a Low Carbon and Climate Resilient Society

- Reducing emissions by 51% by 2030, then to net zero by 2050, and complying with determined sectoral emissions ceilings along the way is no easy task. This should be recognised within the National Planning Framework; however, we know the pathways, technologies and behaviours needed to get to where we need to be.

- It may be appropriate to adjust this vision statement to include a sense of urgency regarding climate action. We would also suggest highlighting the importance of enabling significant transformation, a just energy transition, and the need for a climate-focus to be at the heart of how we live as a society.
- There have been significant achievements over the last number of years in setting out a legal basis for climate action, sectoral carbon ceilings, corresponding carbon budgets, the Climate Action Plan 2023, and the associated governance structures to monitor and stress progression against national targets. It is imperative that the revised National Planning Framework should focus on implementation and delivering on these targets.
- Where there may be regulatory, capacity, or finance barriers to rapid progress, the NPF should commit to addressing such barriers through appropriate planning framework mechanisms.
- Capacity building within the wider energy landscape is also an ongoing intervention critical to reaching Ireland’s climate targets.
- We would call for a fast-tracking process developed for delivery of critical infrastructure deemed to be of national climate action significance.

9. Sustainable Management of Water, Waste, and other Environmental Resources

- No comment

10. Access to Quality Childcare, Education and Health Services

- Local services that reduce individual vehicle journeys are essential to drive emission reductions in the transport sector.

Chapter 9: Climate Transition and Our Environment

SEAI’s observations on areas covered within this chapter include:

Biomethane

- The National Biomethane Strategy was published on 28 May 2024, which outlines the roadmap to supporting delivery of up to 5.7TWh of indigenously produced biomethane by 2030. Related to this, DAFM along with SEAI opened the Biomethane Capital Grant scheme in May 2024, this is now closed for applications. This Capital Grant is funded by the European Union Recovery & Resilience Facility.
- Implementation of the National Biomethane Strategy and delivery of the actions within will require concerted action across key Government Departments and agencies to ensure the necessary supports and infrastructure are in place to support the biomethane industry. This should be acknowledged within the NPF.

Built Environment

- SEAI would recommend the following measures:

- No new gas connections (in all sectors).
- Expanded energy efficiency supports for businesses, and homes.
- Ensuring large energy users (LEUs) must adhere to stricter energy efficiency standards and partner with or sponsor the development of infrastructure schemes to offset a portion of increased demand. SEAI has also sponsored development of a proposed LEU Electricity Emissions Reporting Framework, when adopted, this will support monitoring of planning conditions imposed upon LEU's regarding emissions and renewable energy.
- Retrofitting
 - The continued use and replacement of fossil fuel heating systems (such as oil and gas boilers) present significant obstacles to Ireland's ability to meet our climate commitments, improve occupant health, and create a sustainable energy system. SEAI supports the restriction on the replacement of fossil fuel heating systems. Allowing the continued replacement of fossil fuel heating systems with similar technologies will lock in carbon intensity infrastructure for decades to come, undermining Ireland's climate goals.
 - Continued support for the delivery of retrofit at scale as a massive infrastructure project.
- Public sector climate action requires changes in funding provision, public spending code requirements, resourcing capacity and strategy prioritisation to facilitate desired action.

Heating

- The draft National Planning Framework cites SEAI's National Heat Study Report 2022, stating a combination of district heating, biomethane and heat pumps in homes, businesses and industry will play a vital role in fast decarbonisation.
- The rapid transition to low-carbon heating systems as a part of the Nearly Zero Energy Building (NZEB) regulation introduced by the Department of Housing, Local Government and Heritage in 2019 is critical to decarbonising heat.
- The up-coming National Planning Framework should take into account the anticipated publication of National Heat Policy. We understand that the policy will underpin a comprehensive approach to decarbonising the heat sector, which will be required to be adopted across all relevant sectors.
- Promotion of efficient District Heating and Cooling Networks should be prioritised in the National Planning Framework for new and existing domestic and non-domestic buildings. This policy should be informed by the analysis, insights and recommendations of the District Heating and Cooling Report prepared as a part of SEAI's National Heat Study. Future policy should also ensure that the recommendations of the Government's District Heating Steering Group report, published in 2023, are implemented in full.

Energy Policy and Planning

- SEAI would agree as outlined in the NPF draft with the three pillars to Energy Policy and Planning: (1) sustainability, (2) security of supply and (3) competitiveness; however, this overlooks a potential fourth pillar which would be (4) energy equality. All citizens should have an equal opportunity to access the energy services and technologies they require to meet their needs. This includes ensuring that energy policy and planning is designed to reduce and ultimately eliminate energy poverty.
- The most secure energy is the energy that we do not use and therefore, energy efficiency should always form part of our response to energy security, policy, and planning considerations. SEAI would add that a shift to locally produced renewables, substituting for energy imports, is the best way to supply remaining demand, after energy efficiency (EE) and energy sufficiency options are considered and implemented.
- Any action taken in order to improve security of energy supply must be proven to fit within Government's plans for living within the legally binding carbon budgets and sectoral ceilings. Associated analysis should be undertaken to ensure that options are assessed in the context of the existing Government targets and package of policies and measures.
- SEAI would also call for a joint approach to electricity and gas grid planning. This should include detailed assessments of different infrastructure pathways on a by sector and by fuel basis. These should also include the need for new infrastructure to decarbonise rapidly in line with carbon budgets and sectoral ceilings, such as the rolling out of heat pumps and district heating. SEAI's National Heat Study¹ provides a detailed analytical basis for decarbonisation of heat in the context of net-zero 2050 ambitions.
- Ensuring that the development of regional and national energy infrastructure that connects renewable energy projects to areas of consumer demand will be important to support our climate objectives. The policy should include a focus on spatial planning that supports the expansion of transmission lines and energy hubs.

Renewable Electricity

- The SEAI National Energy Projections 2024 report (Section 4.1.4) to be published in September 2024, will highlight that Ireland is not on a trajectory to meet the 2030 renewable electricity target of 80% of electricity demand. The projections were informed by analysis of the responses to an expert elicitation executed by SEAI earlier in 2024. The most common fundamental reason experts cited, for Ireland's inability to deliver the required renewable power generation capacity, was a protracted and arbitrary planning process and additional delays brought about by excessive resort to judicial reviews of planning decisions. The situation concerning our targets is not irretrievable, but it will require urgent action to address the challenges within the planning process if the required pipeline of renewable energy projects to meet those targets is to be stimulated.

¹ <https://www.seai.ie/data-and-insights/national-heat-study/>

- Extensive development of Ireland’s electricity transmission and distribution systems will be required to facilitate both renewable energy deployment and electrification of heat and transport targets. The planning process must anticipate and facilitate the development of this critical infrastructure and, in particular, transmission lines that traverse the jurisdiction of more than one planning authority. ESB Networks have proposed “Renewable Hubs” as being an element of the plan to deliver network upgrades and these must be facilitated within the forward planning and permitting processes.
- The REPowerEU policies, transposed in both regulations and legislation, including the 3rd Renewable Energy Directive, impose time limits upon the total consenting periods, meaning combined planning permission and grid connection processes, for renewable energy projects of various scales. The current combined duration of these processes in Ireland will not meet the EU requirements for renewable energy projects at most scales. The solution to meeting the time limits will involve a level of coordination between the planning permitting and grid connection processes and this must be anticipated in the NPF. Efforts must also be made to consolidate and reduce the large number of individual permits that may be involved in consenting a renewable energy project. SEAI has catalogued a total of 63 individual licences and permits that may be required in the consenting process for renewable energy projects, which place a high burden upon applicants and compromise the implementation of a streamlined process for project consenting required by the EU. Adequate human resourcing of the consenting system needs careful consideration as the system is amended and strengthened. For example, the raising of the threshold for planning applications being submitted to An Bord Pleanála from 50 MW to 100MW places a significant extra burden on Local Authority Planning teams.
- The publication of robust updated Wind Energy Development Guidelines will be critical to facilitating the ongoing development of the onshore wind energy sector to meet national targets. SEAI has provided support to DECC and DHLGH in developing the updated guidelines since the update was first engaged with in 2013. We would emphasize that the final guidelines need to arrive at a pragmatic balance between protecting the environment and residents near wind farms with the imperative to address climate change and to provide certainty to developers on locating wind farm projects. The Climate Action Plan also requires that similar guidance be developed for solar farms, and this should be anticipated within the planning framework.
- It will be important to understand and plan for the likelihood of the occurrence of correlated meteorological events affecting multiple renewable energy resources simultaneously, for example, low wind speeds affecting wind energy, occurring simultaneously with mist or fog affecting solar energy and with low temperatures affecting heat pump efficiency.
- SEAI would welcome the decentralisation of energy systems promoting regional energy projects and particularly community-based energy projects. This is important to involve support for local energy projects and schemes to engage communities in renewable energy production increasing local buy-in and shared benefits.

Rural Areas and Energy Production

- We welcome the inclusion of the Community Benefit Funds mentioned within the NPF draft. As mentioned in the report, communities can benefit greatly through community benefit funds established by developers of renewable energy projects. Community Benefit Funds are used for the wider cultural, environmental, and economic well-being of the local community.
- As above, SEAI has long promoted a revolution of Ireland’s energy system to one based on efficient use of locally generated renewables.

Making a Just Transition

- Engagement with all citizens will be critical in bringing society through their sustainable energy journey, combined with rapid decision making.
- SEAI would recommend that the National Planning Framework and any supporting policymaking ensure a fair and equitable transition for workers and communities affected by the shift away from fossil fuels, particularly in regions heavily dependent on these industries.

Regional Renewable Electricity Capacity Allocations

- SEAI would welcome progress towards alignment between regional and local plans and renewable energy targets. SEAI has supported the Department for Environment Climate and Communications in developing the Renewable Electricity Spatial Policy Framework, in which analysis was executed supporting the identification of regional allocations.
- National Policy Objectives 75 and 76: This will require finalisation of a Regional Renewable Electricity Strategy (RRES) by each Regional Assembly for Local Authorities to deliver Target Power Capacity (MW) allocations through City and County Development Plans. SEAI has been supporting the Regional Assemblies in drafting guidelines for developing their Regional Energy Strategies and through updating the SEAI methodology for Local Authority Renewable Energy Strategies (LARES). The latter will be published for public consultation in Q4 2024 and will provide practical guidance for local authority planners, supported by training and online resources.

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