



## IRISH PLANNING INSTITUTE

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[Sent by email: [consult@eirgrid.ie](mailto:consult@eirgrid.ie)]

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A Chara,

The Irish Planning Institute (IPI) welcomes the opportunity to comment on Eirgrid's Shaping Our Electricity Future Roadmap and the intention of Eirgrid to underpin and support a proactive approach to the development of the grid in Ireland. Some 900 IPI Members work right across the planning system – in planning consultancies, for developers, in Planning Authorities, Regional Assemblies, semi-state organisations, An Bord Pleanála, and Central Government.

As outlined in detail in the associated Technical Report, the development of the national grid is of critical importance to support the economy and society and realise the transformation of Ireland's energy system to meet climate action and energy obligations. The IPI supports the growing recognition that we need to move away from the old system of predict and provide and instead ensure that we have the necessary infrastructure to attract business, accommodate economic growth and the future sustainable development of our environment. Our submission will cover key areas for consideration below.

### **Strengthening Integration of Renewable Energy Potential and Environmental Considerations**

- The IPI believes that the planning and development of the grid, including network investment, needs long-term planning and should be guided by the objectives of balanced regional development and spatial and economic growth targets set out in the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES).
- Developing a spatial understanding of existing and future energy demand across sectors allows the necessary policy decisions around energy efficiency and renewable energy technologies must be closely aligned with spatial plans. The development of energy infrastructure as well as the enhancement and reinforcement of the grid will be critical in underpinning the delivery of each Local Authority County Development Plans and Local Area Plans. Eirgrid should consult closely with Local Authorities and ensure the Core Strategies of spatial plans are informed by a plan-led approach to energy provision.
- Roadmap scenarios outlined need to be informed by environmental considerations, including Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment.

### **The Potential of Offshore Renewable Energy**

- The Draft National Marine Planning Framework, Climate Action Plan 2019 and our Offshore Renewable Energy Development Plan highlights Ireland's offshore renewable energy potential. Eirgrid's roadmap should support and deliver grid development in our maritime area as a strategically important location for renewable energy production.
- Offshore renewable energy production and distribution needs to be delivered and supported by investing in technology, and grid infrastructure, not only on the east coast as indicated in the Generation led scenario, but also on the south, west and northern coasts. In addition, renewable energy generated from marine sources can supply locations of high demand and targeted growth in line with spatial planning and economic policy across national, regional, and local level.
- In addition to cross regional distribution, renewable energy produced from offshore renewable energy sources could supply, at shorter distances, the power demand generated from population and economic growth in towns and cities co-located with harbours, estuaries and the coast.

### **Integration of Grid Development and Port Infrastructure and Facilities**

- The Roadmap for Shaping our Electricity Future, especially a new Framework for grid development, needs to sustainably plan for and deliver the infrastructure and technology in our terrestrial, marine and coastal areas and integrate with Port infrastructure and facilities.
- There is also greater potential for the energy sector to work in partnership with our port sectors. Our cities and metropolitan areas are closely interconnected with economic activity of Tier 1 and Tier 2 Ports which play a strategic role in economic development and growth. Port facilities are potential locations for an interface between marine renewable energy infrastructure development and connection with the grid network on land. The roadmap needs to give strengthened support for these partnerships to harness and connect with marine renewable generation.

### **Strengthen and Blend the Approaches to Achieve Renewable Energy Targets and Service Centres of Demand Across All Regions**

The IPI supports strengthening and blending the scenario approaches in principle to achieve the quantum of onshore and offshore renewable energy and service centres of demand required across Ireland to mitigate climate change and meet our energy obligations. The IPI believes that focusing on one approach alone will not meet our 2030 renewable energy targets, and instead, a blended approach between the scenarios is the preferred approach. However, the specific synergies and additionalities of a blended approach will need to be articulated in the final strategy to enable the delivery of a comprehensive plan for future grid development.

#### **1. Generation-Led**

The IPI acknowledges our regions have varied capacity for producing different types and levels of renewable energy. Generation should be as close to use as possible to ensure greatest efficiency. The IPI supports the generation-led approach, whereby policy should determine the optimal location for renewable energy systems to harness Ireland's abundant energy resource.

However, the location of generation will be based on a balanced consideration of social, economic and environmental objectives around sustainable development, and it will be important that a generation-led approach is set within the context of sustainable spatial planning.

The Generation-led scenario should be enhanced to achieve committed targets for offshore renewable energy, pursue partnerships between energy and marine sectors such as ports, deliver infrastructure for grid connection and rather than consider offshore renewable energy as a remotely located resource away from high demand centres, regard offshore renewable energy as a means of servicing towns and cities.

## **2. Developer-led**

Clearly, the strategic approach to electricity generation should be plan-led, and within a larger spatial planning context as set out above. Developers have a critical role in this process, in engaging with the policy and guidance preparation at national level, contributing to plan-making process at all stages and levels (e.g. Regional, City/County and Local) and delivering on projects in their own capacity or in partnership with other agencies. A resilient and future-proofed grid will require a partnership approach, between public agencies, developers and the community and this approach can be managed through the planning process.

## **3. Technology-led**

Technology will play a critical role in improving efficiency, and it may ultimately provide greater flexibility around the location of generation. The Technology-led approach is framed as almost prohibitively expensive, but with cost benefit ratio assessments, there is the potential to develop a world class resilient infrastructure, which will make Ireland competitive and a leader in the green economy and renewable energy sector. Cost benefit ratio assessments could demonstrate and justify the outlay in capital costs such as underground high voltage transmission cables, large scale converter stations and smart grid technologies delivering a net benefit to the environment, society and economy.

## **4. Demand-led**

The location of larger electricity users should be based on robust spatial plans that are 'demand-informed' rather than 'demand-led'. There are many considerations underlying regional and county settlement and development strategies. These are ultimately driven by the need to secure the objectives of sustainable development. The location of electricity generation and larger electricity users is an important element in all of this, however, it is not and should not be, the sole determining factor in decisions around settlement or the location of development.

Distribution of energy demand will support the policies of the NPF, RSES, MASPs and City or County Development Plans to meet the projected population and employment growth in Cities, Towns and villages.


The IPI recognises the challenges large consumers of electricity such as data centres can pose to the future planning and operation of a sustainable power system. The IPI supports the approach set out to influence the location of large energy users to locate across the network where capacity exists rather than concentrating in already congested areas distant from renewable sources. In this regard, regional options can be explored and promoted towards reducing the need to develop additional grid infrastructure.

## **5. Conclusion**

The Irish Planning Institute recommends that Eirgrid should form an expert group to review and comment on a final draft before publication later this year to allow for further engagement and collaboration on this important initiative. The Institute appreciate the opportunity to provide its views

on the public consultation on Eirgrid's Shaping our Electricity Future. If the Institute can be of any further assistance, please do not hesitate to contact us.

Yours sincerely,



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**President 2020 - 2021**

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