



IRISH PLANNING INSTITUTE

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[Sent by email: SPPSTeam@infrastructure-ni.gov.uk]

11th February 2022

Dear Sir/Madam,

The Institute welcomes the review of the Strategic Planning Policy on Renewable & Low Carbon Energy and the opportunity to be consulted thereof. The IPI believe the below points should be considered at this initial stage of the review.

The IPI recommends developing a spatial understanding of existing and future energy demand across sectors which will allow the necessary policy decisions around energy efficiency and renewable energy technologies. This must be closely aligned with spatial plans. The IPI acknowledges that our jurisdictions have varied capacity for producing different types and levels of renewable energy. This can best be made transparent within the local planning policy context.

Generation should be as close to use as possible to ensure greatest efficiency. The IPI supports introducing a generation-led approach, whereby policy should determine the optimal location for renewable energy systems to harness Ireland's abundant natural energy resource. The Department for Infrastructure should consult closely with local government to ensure that local development plans are informed by a plan-led approach to energy provision.

The Institute suggests an asset-based approach in the location of wind energy development. The asset-based criteria underpinning the methodology comprising *inter alia* wind resources, population, infrastructure and landscape capacity. The IPI supports introducing new provisions within strategic planning policy to provide for a more strategic spatial approach to delivering renewable energy including identifying optimum locations for renewable generation. It is considered that the 70% renewable energy target needs to be translated in MW of each technology (onshore, offshore, solar and hydro) for each region and Council. In addition, guidance on what these MW means in spatial terms will need to be provided.

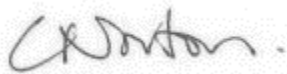
Renewable energy is central in Ireland achieving its climate change targets and should not be treated as a temporary solution. Strategic planning policy should as a goal achieve permanent renewable locations potentially operating in the longer term. Satisfying the objective to enable renewable energy infrastructure to continue producing clean energy at a low cost to the consumer.

In the matter of wind farms policy should recognise the importance of end-of-life decommissioning. To ensure that this is carried out in the correct manner, and that funds are allocated to cover these

work: it is common for a wind farm planning permission to contain conditions that ensure that prior to construction the developer must submit a comprehensive decommissioning plan and a decommissioning works, which could be triggered once the project has stopped exporting electricity to the grid. A contingency for mandatory decommissioning as part of the planning permission provides the Council with comfort that once the wind farm ceases operations, it will be properly decommissioned in accordance with the planning conditions.

The Irish Planning Institute appreciates the opportunity to give its views on the public consultation on the revision of the Strategic Planning Policy on Renewable & Low Carbon Energy. If the Institute can be of any further assistance to this important initiative, please do not hesitate to contact us and we look forward to having an opportunity to comment on further publications.

Your sincerely,



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