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23 January 2019

Re: Eastern and Midland Regional Assembly (EMRA) Draft Regional Spatial and Economic Strategies (RSES) Consultation

To whom it may concern,

Statkraft Ireland welcomes the opportunity to make a submission in respect of the Draft Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategies (RSES) consultation.

Statkraft Ireland is wholly owned by Statkraft, a leading company in hydropower internationally and Europe's largest generator of renewable energy. The Group produces hydropower, wind power, solar power, gas-fired power, supplies district heating and flexible grid services including battery storage projects. Statkraft is a global company in energy market operations. In October 2018, Statkraft acquired 100 per cent of the shares in Element Power Ireland Ltd. The team at Statkraft Ireland has constructed a portfolio of approx. 210 Megawatts (MW) of wind projects in Ireland, operates approx. 290MW and has an established track record in wind energy in Ireland, with its Irish team based in Tullamore, Co. Offaly and Cork. This team has previously developed over 16 wind farms in Counties Clare, Cork, Kerry, Donegal, Limerick, Galway, Waterford, Tipperary, Offaly and Tyrone.

Statkraft Ireland have carried out a number of studies and surveys in this Region and we believe that given the correct support and guidance from the RSES, that this Region is ideally placed to harness its renewable energy potential and thereby contribute towards the low carbon society including transition to clean renewables which is key aspect of Ireland's response to climate change.

Statkraft Ireland sees the RSES as an important first step in the transition away from the Local-Authority devised renewable energy plans and policies, towards a more standardised, regional approach with an overarching set of policies and a single plan across the 13 Local Authorities of the Region, which is better capable of translating the requirements of national policy for the benefit of individual projects.

Statkraft Ireland welcomes the Draft Strategy's inclusion amongst the 16 Regional Strategic Outcomes to "support the transition to low carbon and clean energy" and the objective to "... harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050". The impacts of climate change are visible

around the world via extreme weather events on a daily basis. This is also very evident from the extreme weather events experienced here in Ireland over the last 12 months. The scale of the climate change challenge faced by our nation is looming ever larger. In light of this ever-growing challenge, Statkraft Ireland has some concerns that the multiple references in the Draft Strategy to “supporting the transition to a low carbon economy by 2050” will give the false impression that action to combat climate change can be delayed. This is not the case.

The significance of the Region’s resource potential for renewable energy is acknowledged in Table 3.1 of the Draft Strategy. However Statkraft Ireland would like the RSES to be more specific on how this resource potential is going to be harnessed, to ensure the potential of that resource can be maximised.

The County-level approach to the identification of areas with wind farm potential, has been recently, and is likely to continue to be undermined to the detriment of the necessary energy transition. Anti-wind objection groups that have formed to object to specific proposed wind farm projects, have regularly turned to the County Development Plan review process to undermine policy support for wind farm development at the county level. Such groups have often called for county-wide bans on wind energy developments, while this will suit their aims, it does nothing to further the transition to a low carbon economy and decarbonise the electricity sector. The Local Authority’s development plan preparation process will find it immensely difficult to translate Government Policy in renewable energy into measures that can truly match the scale of the climate challenge we face as a nation. Across 31 Local Authorities nationwide, or the 12 in the Eastern and Midlands region, how much each Local Authority area has to contribute to the energy transition to a low-carbon economy should be determined on a regional basis by firstly determining what the region as a whole must contribute and identifying what the Region’s potential is. Where and how the renewable energy potential of a Region is to be best-harnessed, must be determined on a regional basis, and not county by county.

Statkraft Ireland is pleased to see included in the Draft RSES, recognition that “it is necessary to establish a consistency of approach by planning authorities, both in identifying areas suitable for renewable energy developments and having regard to potential impacts”.

The Regional Policy Objections on decarbonising electricity generation, and **RPO 7.34** and **RPO 7.35** are particularly welcome and we look forward to the outcomes of this process.

RPO 7.43: EMRA shall, in conjunction with Local Authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, in the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy should be developed to support delivery of projects within the Strategic Energy Zones.

RPO 7.35: Planning policy at Local Authority level shall reflect and adhere to the principles and planning guidance set out in the Department of Housing, Planning and Local Government publications relating to ‘Wind Energy Development’ and the DCCAE Code of Practice for Wind Energy Development in Ireland on Guidelines for Community Engagement and other relevant guidance which may be issued in relation to sustainable energy provisions.

The ERMA should lead the identification of suitable areas for larger renewable generating projects, to ensure a consistent approach is used throughout the region and the potential of

the entire region is identified in a single exercise that aligns with the energy transition targets that must be delivered across the entire state. Unless this responsibility to lead this process is specifically assigned to the ERMA, Statkraft Ireland would be concerned it might be Local Authority-dependant, could become disjointed and may not be progressed in the timeframe required. Statkraft Ireland strongly recommends that this exercise is carried out immediately in order for Ireland to transition to a low carbon economy and meet our targets. Accordingly Statkraft Ireland request that in relation to **RPO 7.43** a date is proposed by which these zones will be identified.

Section 10.3 entitled "Energy" of the Draft Strategy very clearly and succinctly identifies how we need to better leverage our natural resources to increase our share of renewable energy and meet our energy targets.

Statkraft Ireland strongly endorses the Regional Policy Objectives **RPO 10.14 – RPO 10.19**. The draft Strategy highlights the importance of developing the grid in the Region which will enable the transmission system to safely accommodate more diverse power flows from renewable generation and also to facilitate future growth in electricity demand, strengthen the grid for all electricity users, and in doing so will improve the security and quality of supply to ensure the Region is to attract high technology industries that depend on a reliable, high quality, electricity supply. The continued reinforcement of the electricity transmission grid is going to be critical to ensure the full renewable energy potential of the Region can be harnessed.

Statkraft Ireland appreciated the opportunity to contribute as the RSES and look forward to seeing the updated plan documents in due course.

Please don't hesitate to contact me if you need any further information.

Yours sincerely,



Tina Raleigh

For and on behalf of Statkraft Ireland Limited

