Draft Revised National Planning Framework

Consultation Response

September 2024

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Contents

Who we are

At SSE, we are driven by our purpose: to provide the energy needed today while building a better world of energy for tomorrow. SSE develops, owns, and operates low-carbon infrastructure to support the transition to net-zero. This includes onshore and offshore wind, hydropower, electricity transmission and distribution networks, alongside providing energy products and services to customers. With current interests across the island of Ireland and Great Britain, in addition to carefully selected international markets, including East Asia, Europe and North America, SSE is both growing its footprint and its range of expertise in our bid to lead the transition to net-zero.

Since entering the Irish energy market in 2008, we have invested significantly, with a total economic contribution of just under €2bn in the last 3 years, supporting over 3,270 jobs in 2022/23. SSE Renewables owns 684 MW of onshore wind capacity across the island and operates a total of over 1,000 MW, with SSE Thermal owning and operating 672MW of flexible generation capacity to support security of supply.[1] SSE Renewables has operated a voluntary Community Fund in Ireland since 2008, and SSE Renewables has awarded almost €1 million over the last year to over 268 community groups that neighbour our wind farms in. To date we have invested over €12.3million to community groups across the country and 17 scholarships.

At SSE, we have a clear focus on electricity infrastructure as the key to unlocking decarbonisation. Our growth helps power (and is powered by) society's drive to develop a clean, secure and affordable energy system. Recognising the international importance of decarbonising the power sector, SSE aims to achieve net zero across scope 1 and 2 emissions by 2040 at the latest including through investment in low-carbon dispatchable power generation options such as Carbon Capture and Storage, Hydrogen and electricity storage.

General Comments

As a developer and operator of energy infrastructure, vital to Ireland's climate ambitions and security of supply, the focus of our submission is offering advice on how renewable and lower-carbon electricity developers and generators can facilitate achieving Ireland's climate targets.

The Climate Action Plan 2024 notes that the world's climate is changing rapidly with temperatures increasing faster since 1970 than in any other 50-year period over at least the last 2,000 years. It also

[1] SSE's Economic Contribution to the UK, Scotland and the Republic of Ireland, FY24 results (PwC report), May 2024. https://www.sse.com/media/zz3huuie/eia-group-report-fy24.pdf

stresses that rapid and significant reductions in GHG emissions are required if we are to meet our climate obligations as underpinned by the Climate Act and avoid the harmful impacts of climate change.

SSE welcomes the opportunity to participate in the revision of the National Planning Framework (NPF) and appreciates the role this document plays in the hierarchy of land use planning in Ireland in aligning all regions to achieving national Climate Action Plan targets for the acceleration of renewable energy. The Draft NPF 2024 contains far more detail on energy generation and its role in reducing carbon emissions than the 2018 version. SSE welcomes the focus on the energy transition and Ireland's role in addressing the climate crisis.

SSE acknowledges that the emphasis of the NPF is to allocate population growth across urban areas of Ireland in accordance with principles of sustainable planning and development. It is accepted that carbon emission reduction is intrinsically linked to urban growth patterns. In the context of urban planning, issues such as development density, transport, accessibility, water and waste management are generally the primary concerns of policy makers. Notwithstanding, decarbonisation of our electricity system is critical in creating low and zero emission living environments and transportation networks. The availability of net zero carbon energy is central to achievement of the NPF objectives.

In this regard, it is critical that industry is involved in the identification of future locations that are optimum for renewable energy development.

Executive Summary

1. **Prioritising the Climate Emergency in Planning:** The National Strategic Outcomes (NSOs) in the NPF should be re-prioritized. Specifically, the objective of transitioning to a low-carbon and climate-resilient society, currently ranked 8th out of 10, should be elevated to a top-tier priority. This will ensure that climate considerations are central to all policy and decision-making processes.

2. **Renewables Development:** NSOs relating to the designation of appropriate locations for renewable energy use and generation must incorporate the many climate and other benefits brought about by this type of development, with strong considerations required to deem an area is not an appropriate location for renewables development. Proposed regional and local capacity allocation requirements should stipulate that these should be seen as a **minimum, rather than a cap**, on renewables development in a region or local authority area and must be futureproofed beyond 2030 targets. It should also be made clear that these allocations should not preclude development beyond this allocation or in areas not proactively identified by authorities for such development.

3. **Guidance on Visual Impact:** Under NPO 88, develop and disseminate clear guidelines for balancing landscape and visual impact concerns with the need to meet climate action goals. While landscape preservation is important, visual impact is unavoidable in wind projects and should not be a primary reason for refusing development applications except in extreme circumstances.

4. **Recommendation for the Inclusion of IROPI:** In light of the European Union's Renewable Energy Directive III (RED III), the Irish government should fully integrate the concept of "Imperative Reasons of Overriding Public Interest" (IROPI) into the NPF. Sections 217 and 218 of the Planning and Development Bill (2023) establishes IROPI status for renewable energy projects. This status ensures that renewable energy projects are recognised as serving the public interest and advancing Ireland's climate and energy goals.

SSE Submission

1.1 Prioritising the Climate Emergency in Planning

> **Recommendation**: The National Strategic Outcomes (NSO) in the NPF should be reordered to elevate the priority of 'Transition to a low-carbon and climate-resilient society' from its current position (8/10) to that of a top-tier priority, **ensuring that climate considerations are central to all policy and decision-making processes.**

The climate emergency and Ireland's targets under the *Climate Action and Low Carbon Development Act* must be at the forefront of planning policies, with renewable and lower carbon energy development recognised as a critical component of sustainable development and in the long-term public interest. Decarbonisation of our electricity system is critical in creating low and zero emission living environments and transportation networks. The availability of net zero carbon energy is central to achievement of the NPF objectives.

Planning policies at all levels should explicitly support these targets, including renewable and lower carbon electricity infrastructure, highlighting their significant role in achieving net-zero emissions and promoting sustainability.

1.2 Maximising Industry-led Solutions

> **Recommendation:** In alignment with NPO 71, SSE recommends that guidance be given to the effect that the identification of 'appropriate locations' for the development of renewable energy use and generation be defined in light of the weighty benefits brought by renewables and low carbon development.

SSE believes that industry is uniquely equipped and resourced to identify appropriate development sites, so that the vast majority of areas should be open to consideration for renewables development within Local planning policy. We also propose that the section be expanded to support the life extension and repowering of existing capacity and delivery of other low-carbon generation technologies in support of security of supply.

It is critical that as Regional Strategies and County Development Plans begin to align with the National Planning Framework, and that all viable areas are explored for renewable development potential. There is an onus on government to explore the full potential of renewable development. This can only be done through active and consistent engagement with industry. Meaningful engagement with industry will help the government achieve its regional and national targets more quickly and more efficiently as industry is best placed and best resourced to find suitable areas for development.

It is not clear at this stage how 'appropriate locations' would be identified under this Objective. Given the national and international climate imperative and targets and designation of renewable development as being of overriding public interest at EU level (Renewable Energy Directive III), the benefits of renewable and low carbon infrastructure would mitigate towards its development unless there are very strong reasons to the contrary. Guidance to this effect should be included within the National Planning Framework.

SSE believes that the designation of 'acceleration areas' under the Renewable Energy Directive and through Local Development Plan zoning for renewable development can effectively promote renewable generation; but we also strongly recommend that areas not so designated should also be open for renewable development, with applications considered on a case-by-case basis in light of the significant benefits brought by renewables development. This will enable projects to progress in areas where industry expertise may identify potential not obvious to land use planners.

Whilst the transition to net zero will be renewables-led, there will be an enduring requirement for flexible generation technologies to provide system support services and provide energy when the wind doesn't

blow or sun doesn't shine. This function has traditionally been fulfilled by conventional fossil fuel power stations, and the consequences of a shortfall in this type of capacity is well outlined in the 2021 Government Policy Statement on Security of Electricity Supply[2]. As we progress to net zero, decarbonised solutions such as carbon capture and storage, hydrogen as well as energy storage options must be developed. To ensure security of supply, this type of infrastructure must also be supported by the National Planning Framework. This might be supported in NPO71, or in a separate section (this point is addressed in more detail below).

With respect to the expertise that can be contributed by industry, SSE strongly requests that the wind energy development industry be consulted in Phase 2 of the National Land Use Review and in the designation of 'acceleration areas'.

1.3 Regional Capacity Allocations

Recommendation: The allocations specified should be regarded as setting a minimum level of ambition for regional and local authorities to proactively 'plan for' rather than a cap; this provision should stipulate that renewable and low carbon infrastructure development in any areas outwith those 'planned for' under NPO 75 and 76 should also be promoted, and certainly not be prevented as per the Renewable Electricity Directive III. This is consistent with the classification of renewable generation capacity as being of overriding public interest under that Directive.

Wording in the NPF should be changed from 'specific targets' to 'minimum capacity' and should read as follows: "Each Regional Assembly will prepare a Regional Renewable Electricity Strategy (RRES), whereby additional detail will be outlined on how the regional renewable electricity capacity allocations for the region can be best achieved in a consistent and sustainable manner, including the identification of **minimum capacity** for each of the constituent local authorities.

Recommendation: The NPF should be designed to future-proof itself by incorporating the latest national targets and carbon budgets. This ensures that even as these targets evolve, the NPF remains relevant and up-to-date.

Alignment of 2030/2040 goals

SSE strongly supports the 2030 national MW target of 9GW for onshore wind-energy generation in the Draft NPF, Climate Action Plan 2024 and EirGrid's Shaping our Electricity Future (July 2023). The regional targets outlined in Table 9.1 of the NPF focus primarily on 2030, which does not align with the broader scope of the NPF which extends to 2040. This creates a substantial gap in the national RE planning framework between 2030 and 2040. Given the long timelines required to develop renewable energy projects and update regional and local planning policies, the 2030 targets will quickly become outdated.

SSE opines that while targets align with the CAP24 and *Shaping our Electricity Future*, they also need to be forward-looking to guide RE development up to 2040. Adequate flexibility should be built in to accommodate the overall Climate Act targets, and expected increase in targets when new benchmarks are set for 2035 and 2040 and future iterations of the CAP.

Targets should be a baseline of ambition

As national wind-energy generation targets are integrated into regional strategies, SSE urges caution against the risk of relying on megawatt (MW) targets at the local level as a primary tool for advancing

[2] gov - Policy Statement on Security of Electricity Supply (www.gov.ie)

renewable energy development and potential. Our experience in the UK shows that county level renewable energy power targets are often used as a cap rather than an enabler of renewable development in an area.

While setting capacity allocations can guide progress toward national renewable goals, viewing these targets as a fixed ceiling rather than a baseline for ambition could lead to several unintended negative consequences, potentially slowing Ireland's transition away from fossil fuels. Key concerns include:

- Treating targets as strict limits could result in underestimating the potential land available for renewable energy projects.
- Additional county-level constraints, particularly those related to landscape and visual impact, may further restrict the developable land, leaving insufficient or suboptimal areas for wind energy development. As outlined above, engagement with industry, who have first-hand experience of technical and commercial factors, can mitigate this risk somewhat.
- If development halts once these minimum targets are reached, there is a risk of a sharp decline in renewable energy progress after 2030.
- By adopting a consistent and transparent methodology, particularly one that integrates both biodiversity and carbon considerations, we can set a clear standard and ensure meaningful environmental outcomes.

Evidence from other regions shows that without careful local implementation, translating national and regional renewable energy targets into county development plans could unintentionally hinder progress towards renewable and carbon reduction goals.

Capacity allocations alone will not suffice; critical factors such as grid capacity (including support for private wire networks where grid access is limited), prioritizing renewable and low carbon infrastructure and climate emergency measures within the planning system, and recognizing renewable energy projects as serving industrial, investment, public health and safety interests must also be considered.

The experience of Scotland, particularly with NPF3, highlights these risks. Local councils applied various constraints related to landscape, sensitive habitats, archaeology, and residential development, which left minimal land available for renewable energy projects. However, Scotland's National Planning Framework 4 (NPF4), implemented in 2023, addressed these issues by bolstering support for onshore wind and prioritizing carbon reduction, even in cases where visual or landscape concerns arise.

SSE believes that NPO75 should clarify that the obligation on regional and local authorities to 'plan for' these allocations is to proactively plan for those capacities through acceleration areas and the like, and that NPO71 should stipulate that 'appropriate locations' be read in light of general obligation to promote renewable and other low carbon infrastructure in support of Climate Act targets and in recognition of the many other benefits brought about through the development of low carbon infrastructure. The Renewable Electricity Directive (paragraph 36) is instructive, it provides that in view of the need to accelerate renewables development, the designation of renewable acceleration areas should not be taken to prevent development in other areas.

These amendments can harness the benefits of proactivity on the part of authorities to streamline the delivery of renewables, whilst leaving open the potential for industry, community or others to progress projects in areas where their expertise shows there is viable potential.

In summary, flexibility is essential when translating regional capacity allocations from the Regional Spatial and Economic Strategies (RSES) and associated Regional Renewable Energy Strategies into county-level development plans. Without close collaboration with industry and a flexible approach to capacity limits, significant opportunities for renewable energy development may be missed, particularly as the country strives to meet its national climate targets.

SSE proposes that in the designation of allocations for local authorities under NPO 75, Regional Assemblies must actively engage with industry. Drawing from the Scotland case study, SSE believes that a flexible and collaborative approach with industry, and requirement that planning policy generally supports renewable development will more effectively and efficiently meet national climate objectives.

1.4 Guidance on Visual Impact and Landscape Considerations

Recommendation: Under NPO 88, develop and disseminate clear guidelines for balancing landscape and visual impact concerns with the need to meet climate action goals. While landscape preservation is important, visual impact is unavoidable in wind projects and should not be a primary reason for refusing development applications except in extreme circumstances. Visual impacts are unavoidable, and this reality must be recognised in decision-making processes. Planning authorities should consider mitigation measures that minimize visual impacts while allowing necessary developments to proceed.

Review of Wind Energy Guidelines

To ensure that Ireland can achieve its renewable energy goals, planning authorities must prioritise the urgency of the climate crisis when making decisions on wind energy and other low carbon infrastructure projects; the policy and decision-making process must recognise the full climate and other benefits brought by such developments (e.g. regional development, security of energy supply, price stability and support for demand growth). This approach is consistent with the classification of renewable generation capacity as being of overriding public interest under IROPI provisions of the REDIII directive. Implementation of this approach requires a balanced and facilitative review by Government of the Wind Energy Guidelines (WEGs), and its incorporation through regional and local planning policy.

Consistency in applying the WEGs across all local authorities is essential. Significant discrepancies in the interpretation of wind energy policies at the local level have led to delays and project refusals. Strengthening the WEGs and providing clear, consistent direction on their implementation will ensure a more streamlined and uniform approach to renewable energy planning decision-making across regions. This will not only facilitate faster deployment of renewable energy projects but also reinforce the national commitment to reducing greenhouse gas emissions. From a project perspective, clarity and predictability reduces risk, time and cost, which brings benefits to the climate and energy customers.

Lessons from Scotland

Ireland can learn from the experiences in Scotland, where local planning decisions have sometimes placed too much emphasis on subjective landscape and visual amenity concerns. Until NPF4 took effect, this had led to the refusal of some onshore wind projects, even when there had been little local opposition. Ireland's planning policies should avoid these pitfalls and prioritise renewable energy generation to meet urgent climate goals.

1.5 Availability of Grid Capacity

Recommendation: In the context of grid connections, the lack of capacity on the network is a serious impediment to future renewable energy deployment. Increasing capacity is essential. NPO 72 should be reworded from:

Support the development and upgrading of the national electricity grid infrastructure, including to support the delivery of renewable electricity generating development

To

*Support an **increase in capacity and** the development and upgrading of the national electricity grid infrastructure, including to support the delivery of renewable electricity generating development*

European context

The EU anticipates a 60% increase in electricity consumption between 2023 and 2030, driven by electrification and the growing use of digital technologies. To meet these demands, cross-border transmission capacity across the EU must double by 2030, and aging distribution grids require

modernisation. The European Commission estimates that EUR 584 billion in investments will be necessary for electricity grid infrastructure across the EU within this decade.

Ireland's Grid Investment
To achieve Ireland's renewable energy and climate targets, significant investment in grid infrastructure is essential. Without a modernized and expanded grid, Ireland risks falling short of its ambitions, potentially leading to energy shortages or the inability to fully harness renewable energy resources.

SSE welcomes the acknowledgment of the crucial role that interconnection of the electricity grid across the island of Ireland plays, as outlined in NPO 62. A robust and interconnected grid is fundamental to ensuring energy security and reliability, particularly as Ireland progresses towards its renewable energy goals. As Ireland transitions to a low-carbon economy, planning for a resilient and flexible electricity grid is essential to meeting future energy demands and ensuring energy security on the island.

Ireland's electricity grid must evolve to accommodate increased consumption, integrate renewable energy sources, and maintain energy security. This requires substantial investment, coordinated planning, and the implementation of measures to expedite grid development, in alignment with broader European objectives. Grid plans included in Shaping Our Electricity Future 1.1, while ambitious, will all need to be delivered on time if hopes of achieving 2030 Climate Action Plan targets are to be achieved.

1.6 Private Wire Support

> **Recommendation:** Include a commitment to support for Private Wires in the NPF. If not included, this could be a missed opportunity as grid build-out will likely remain as one of the key barriers to renewable development.

The Department of Environment, Climate and Communications carried out consultation on Private Wires in 2023. We understand that the outcome of this consultation will be published shortly. The Department recognised that there are currently numerous challenges in building electricity grid infrastructure, both in Ireland and internationally. To accelerate the delivery of the electricity sectors climate targets it is necessary to examine the potential of off-grid opportunities, such as Private Wires.

Private Wires, which encompasses Private Lines and Private Networks, can mean different things to different people, and will vary from project to project, however there are a number of similar characteristics to include:

- They only relate to electricity infrastructure
- They are privately owned, operated, and maintained, not by the general system operators.
- They can relate to the generation of electricity for self-supply or the generation of electricity for sale or onwards distribution
- They can be at either Transmission or Distribution level

For this reason, the NPF should reference the pivotal role that private wires will play in achieving future renewable energy targets and recommend that the National Development Plan provides funding and a suitable regulatory framework, supporting this objective.

1.7 Recommendation for integrating IROPI Considerations into the Revised National Planning Framework

Recommendation: In light of the European Union's Renewable Energy Directive III (RED III), the Irish government should fully integrate the concept of "Imperative Reasons of Overriding Public Interest" (IROPI) into the NPF. Sections 217 and 218 of the Planning and Development Bill (2023) will establish IROPI status

for renewable energy projects. This status ensures that renewable energy projects are recognised as serving the public interest and advancing Ireland's climate and energy goals.

EU Context: RED III and IROPI

RED III emphasizes that Member States should presume renewable energy plants and their associated infrastructure (including grid connections and storage assets) as projects of overriding public interest and serving public health and safety.

The Planning and Development Bill (2023) aims to streamline the development of renewable energy in accordance with REDIII by simplifying the environmental assessment process. By recognizing these projects as being in the public interest, the EU seeks to expedite their approval and construction, which is crucial for meeting the Union's ambitious climate and energy targets.

1.8 Biodiversity

SSE fully support NPO74 which calls for the co-location of renewable technologies with supporting technologies and complementary land uses, including agriculture and biodiversity enhancement based on best available scientific evidence in line with EU and national legislative frameworks. We note that many renewable energy sites are multifunctional land use areas supporting education and research that feeds into best practice methods for peatland restoration and climate science research.

NPF recommendations

Incorporation of Quantitative Biodiversity Net Gain (BNG) into Policy Framework:

- Amend NPO 85 to explicitly require Biodiversity Net Gain (BNG) rather than just addressing no net loss of biodiversity. Planning authorities should be mandated to provide detailed guidelines on implementing BNG, including metrics for assessment and monitoring. This change will encourage developers to not only minimise and offset potential biodiversity losses but to contribute positively to local and regional biodiversity through their projects.

Clarification and Integration of Habitat Retention and Restoration:

- Revise NPO 84 to clarify the balance between habitat retention and restoration, particularly in the context of renewable energy developments. While the retention of existing habitats is paramount, the policy should explicitly recognize the importance of habitat restoration as a compensatory measure when habitat loss is unavoidable. This revision should emphasize the use of the Mitigation Hierarchy and stress that restoration efforts should aim for high-quality outcomes that align with both biodiversity and climate action goals.

A clear and measurable means of assessing biodiversity protection and enhancement is required to demonstrate that targets have been achieved and maintained over time. To this end, many countries are adopting quantitative Biodiversity Net Gain (BNG) metrics as best practice to ensure a consistent approach across planning boundaries and development types and to provide quantitative data to show compliance. Without standardized metrics, there is a risk of different approaches leading to varying results, which undermines trust and accountability. Consistency with existing methodologies, such as those established by DEFRA, is essential, but these frameworks must be adapted to the specific context of Ireland to ensure they are relevant and effective

SSER's publicly available toolkit exemplifies this approach, offering a standardized method tailored to the Irish context. It ensures transparency and comparability, helping to establish a benchmark for BNG across projects. In EirGrid's policy commitment to No Net Loss/BNG, it is piloting SSER Project Toolkit for all new infrastructure projects. By adopting a consistent and transparent methodology, particularly one that integrates both biodiversity and carbon considerations, we can set a clear standard and ensure meaningful environmental outcomes.

1.9 Marine Planning

Recommendation: Include an objective around support for emerging zero or low-carbon technologies.

We broadly welcome the policy objectives outlined in the NPF, particularly as there are many overlapping areas and coordination with onshore planning. However, there is scope to include an additional objective that explicitly supports the infrastructure for offshore development and deployment of emerging or low-carbon technologies. Furthermore, SSE would argue that the inclusion of proposed timelines for delivery of common aims would assist in giving confidence in delivery.

Regarding ports and related infrastructure, the urgency of this support cannot be overstated. Ensuring that our port infrastructure is equipped to handle and facilitate the growth of offshore renewable generation and related industries is crucial for Ireland's transition to a zero-carbon economy.

1.10 Decarbonised Energy Security

Recommendation: Include an objective on decarbonising existing power generation and developing the necessary infrastructure to do so (including but not limited to pumped storage, biomethane, hydrogen and/or carbon capture and storage (CCS), long-duration energy storage and synchronous condensers.)

In 2023, Ireland's primary energy demand continued to rely heavily on fossil fuels, with 82.8% of the total energy requirement being met by these sources. Oil and natural gas together accounted for over three-quarters of the energy demand, 48.8% and 29.4% respectively. Renewable energy sources provided 14.0% of Ireland's energy needs in 2023.[3]

Traditionally, flexibility and energy security have been provided by thermal plants, such as gas-fired Combined Cycle Gas Turbines (CCGT), which can quickly adjust output and rely on large fuel reserves. These plants also contribute to grid stability through services like inertia and reserve power, which are essential for the current operation of grids like Ireland's. However, to move away from relying on carbon-emitting thermal plants, these stability and reserve functions must be replaced by low-carbon alternatives.

Projects focusing on decarbonising existing electricity generation face uncertainty around timelines and criteria for planning and licencing decisions.[4] Local Development Plans should seek to realise their area's full potential for both electricity and heat from renewable, low carbon and zero emission sources.

The timely decarbonisation of existing power generation requires continued investment in our infrastructure and long-term economic and spatial planning. Identifying long-term infrastructure needs is key to delivering an integrated energy system to meet our sectoral emissions ceilings[5]. Technologies such as Carbon Capture and Storage will, if used for either emission reductions or emissions removals, require long-term infrastructure planning; on average, it takes 5–10 years from site selection to the completion and operation of a CCS project[6].

[3] First Look: Ireland's Energy Supply and Security of Supply in 2023 (Part A – Key Insights), SEAi, Energy-Supply-and-Security-of-Supply-Part-A.pdf (seai.ie)

[4] gov - Energy Security in Ireland to 2030 (www.gov.ie)

On a broader level, current policies such as the Renewable Heat Obligation will require an integration of renewable gases into the energy system. This will require the repurposing and, in some cases, the build out of new infrastructure. For both biomethane and hydrogen, planning bottlenecks could arise during the development of infrastructure such as anaerobic digestors, gas network connection points, new or repurposed pipelines, biomethane and hydrogen storage, electrolysers and all adjacent grid infrastructure.

Strengthening the link between national and local planning policy could the buildout of such energy infrastructure elements and hence enable local industry to achieve timely emission reductions.

1.11 Support for life extension and repowering

Recommendation: There should be a stronger emphasis in the NPF on the role repowering will play in achieving national renewable energy targets. SSE recommends a specific policy objective dedicated to encouraging and facilitating repowering. Ireland's climate targets in relation to onshore wind assume a baseline that includes the existing operational wind farms that may be lost unless they are repowered.

Recommendation: SSE recommends stronger emphasis encouraging and facilitating life extensions. A practice has developed of including conditions in planning permissions which limits the operation of wind farms to 25 years, under section 40 of the current *Planning Act*. However, with maintenance and technological developments, we know that wind turbines can safely and efficiently operate beyond this lifespan, with Ireland's oldest operating windfarm now generating power for over 30 years. As a result, these conditions are now causing problems in practice.

Making a planning application for life extension can be a costly and time-consuming process, with the risk that applications are refused, delayed or operators choose to decommission their windfarms rather than enter the process. This risks losing ground in progress to Ireland's 2030 renewable targets and could further compromise Ireland's security of supply situation, with the loss of operating renewable generation capacity.

At a time when we are trying to cut carbon emissions and use resources as efficiently as possible and are in the midst of a security of supply emergency, decommissioning a wind farm that is still operating effectively and continuing to make an important contribution towards Ireland's carbon reduction targets is at odds with policy objectives.