

## Carbon Pricing & Cross-Cutting Policies

Q6: Are there any unintended barriers within the planning system that should be addressed at national policy level in order to deliver our climate ambitions?

**Codling Wind Park Limited:**

The National Planning Framework describes an ambitious plan including how Ireland can take climate action. However, this plan will require significant resources to realise.

CWP believes that the Irish Government and its agencies will have much to do in policy development and further to develop the supporting legislation and guidance for stakeholders, regulators, statutory advisors, the public and other interested parties including developers. This is likely to involve taking a strategic view of policy development across different competencies in different departments in parallel to ensure these new policies align and are available for use simultaneously to support specific targets.

It is also likely to put a high demand on officials across several competencies of Government, at a time when there will be a particularly high demand from the development of new renewable generation projects. An example of this will be An Bord Pleanála (ABP) being the planning authority with respect to Maritime Area Planning. While CWP welcomes ABP's appointment to the role, we note that ABP already appears to be challenged from a resourcing point of view with regard planning appeals related to onshore renewable energy projects, strategic infrastructure decisions and housing applications. The Government needs to ensure that ABP's resources and experience base are sufficiently increased to meet the unique challenges of offshore consenting whilst not affecting its other equally important planning roles.

CWP is pleased that Irish Government will soon create a new Maritime Area Regulatory Authority (MARA), and to be effective CWP believes it must be properly resourced without drawing resource and experience away from other government functions.

Also of concern is the extent to which consenting decisions still seem to be open to judicial review. The robustness of the consenting decision is of critical importance as such interventions can significantly compromise a project. CWP would argue that an element of making the decision robust is ensuring good engagement with experience planning inspectors prior to the application and during the determination period, including the potential to revise the application to where compliance can be improved if this reduces the risk of challenge.

## Public Sector

Q73: What opportunities exist for the public sector to step up its climate ambition?

**[REDACTED] Codling Wind Park Limited:**

CWP notes that recently through SEAI, Irish Government consulted on the potential for Corporate Power Purchase Agreements (CPPA) to become a means of developing future renewable energy generation deployment. The public sector engaging in CPPAs with new and existing developments could help accelerate deployment of projects. The public sector is in a unique situation of having a clear longevity of demand that is vital for such CPPAs, in terms of being able to commit to the required level of 15 years.

## Electricity

Q11: What options are available to increase the penetration of renewable electricity beyond the up to 80% committed to in Climate Action Plan 2023?

**[REDACTED] Codling Wind Park Limited:**

CWP is of the view that Irish Government and the energy system stakeholders such as EirGrid and CRU already have many of the options available that will be necessary to achieve the 80% target and to extend that further by 2030. We would list the following as options which can make significant contributions.

Target setting. The 80% target is useful to instil confidence in developers and investors in the size of the potential market, however given that 2030 is less than a decade away, the industry could usefully see the Irish Government's aspiration to 2040 and 2050, as many projects will take well over 10 years to take from conception through development to commissioning.

The Irish Government could usefully establish long term programmes which clearly define the duration of the support schemes/auctions that will be available (beyond the existing auctions) and the capacity that will be available within them. This will give confidence to developers of the longevity of the scheme and therefore ensure that projects have good time to be developed.

Specifically for offshore wind, an understanding of what the proposed Enduring Regime could look like and the timescales for potential development would enable developers to consider the viability of their existing development plans. There is currently a high risk of hiatus between the Phase Two development projects and the Enduring Regime. The total capacity of projects which will be assigned Phase Two status will be relatively small compared to the potential capacity of projects in the development pipeline. And of these Phase Two projects only a proportion will be successful in the ORESS auction process. This will leave many developers with projects that have an unclear viability, and potentially significant sunk costs.

Ireland is making commitments to the EU for significant offshore capacity, but so far is offering a very slow and limited route to realise these commitments, including a 37GW target by 2050. If the current target of 7GW is achieved by 2030, that will mean an installation rate of at least 1.5GW per year.

**Consenting.** It is accepted that consenting is a difficult process to get right as our understanding of the environment evolves and as the environment itself changes, either naturally or by intervention. However, it is important that both developers and planning officials have the best information and resources to enable sound projects to be put forward for consent with confidence that success is feasible. Key to this will be clear guidance on how projects will be consented. This will not only support developers but more so the Regulators, statutory advisors and the public. It helps to establish a clear procedure for decision making and supports transparency of the process.


**Regulatory stability.** It is fundamental to developers entering projects in the support mechanism schemes that these schemes are not altered post award. Recently, the CRU has revisited matters which affect the efficient use of the CfDs including such things as payments for constraint and curtailment, PSO Levy volatility. These are matters that could usefully have been established before the auction to ensure developers have confidence in their bids.

**Grid.** Potentially the most significant single item that could be changed to enable increased deployment is the speed of grid improvements, an increase in the development of reinforcements and upgrades including linking of centres of renewable energy deployment and innovative connection for offshore projects. As the matching piece of infrastructure to the renewable projects, it is vital for progress towards targets that grid infrastructure is enabled in a timely fashion. This will almost certainly require a level of anticipatory investment in the design development and commissioning of grid infrastructure. There is already much known about the likely locations of renewable generation and clearly about the centres of demand, so progress in linking these areas ahead of generating projects being delivered would be appropriate. There will be many upgrades and reinforcements which could be made which will be “no regrets” for the electricity system operator and will enhance the rate of renewable electricity generation deployment.

Considerable upgrades of the transmission network and system are required to achieve the 80% RES-E targets. This includes the reinforcement of the transmission network discussed above. EirGrid will also have to extend the DS3 program to achieve the 95% SNSP proposed in EirGrid’s Shaping Energy Future consultation. As well as increasing the SNSP it is also critical that zero carbon system services are increased on the system to allow conventional generation to be turned off at times of high renewable generation. The two proposed new interconnectors will also be critical to managing the 80% RES-E on the system. Last year CWP highlighted in its response to the CAP21 Interim Consultation that any increased ambition above 70% RES-E will need corresponding commitment by the Irish Government to develop the transmission network and system further to accommodate higher RES-E levels. Additional mitigation measures could include 100% SNSP, zero minimum conventional generation levels and further interconnection.

**Speed.** CWP believes that much opportunity is being lost due to slow progress in development of policy and legislation, and then slow enactments of these policies and regulations. CWP accepts that getting the right solution is as important as getting to the solution quickly, however there are steps which seem to have taken much longer than would have been anticipated. This also applies to the consenting processes and building of grid infrastructure.

Q12: What can be done to accelerate/facilitate the delivery/deployment of offshore wind and solar PV in particular, in the context of Climate Action Plan 2021 and the REPowerEU ambition?

 Codling Wind Park Limited:

Note CWP's comments in this question build on comments in Electricity Question 1 and focus on offshore wind.

CWP. Particularly for offshore wind, a clearly set out and well managed series of RESS auctions creating a competitive environment will significantly increase the uptake of offshore wind, along with clear guidelines and practice for the connection of offshore wind farms.

We note and welcome that Irish Government has now published in May 2021 its conclusion and its proposals for the connection of offshore wind farms through the first three Offshore RESS rounds. However, particularly for those projects in the first round, there is an urgent need for clarity on the required specifications, accepted landing points and asset transfer process for the offshore wind farms' transmission infrastructure, to enable the projects to bid with confidence in the first auction.

Support mechanisms. The onshore wind RESS 1 and 2 CfD auction rounds have been useful in establishing the new route to market for renewable projects, and it is good to see the Government's intention that Offshore RESS will commence in 2022 with the auction in 2023. This first Offshore RESS auction must be designed to ensure a level playing field for participating projects. It is important that there is a common set of entry qualifications for all projects, and that no project is put at a disadvantage through late changes to the rules. In order to maximise the effectiveness of the auction and help to accelerate the growth of offshore wind, the first and subsequent Offshore RESS auctions should be developed to ensure that the maximum capacity of projects can be successful, while still achieving a competitive process. Combining the known pipeline of onshore projects with the offshore projects being developed could mean that the 80% target is exceeded by 2030. However, if there is a restricted capacity of offshore wind allowed to be successful in Offshore RESS1, then projects delayed to the second round could miss the 2030 target date. Additionally, by encouraging a large capacity to be successful, Irish Government will be sending a signal that it is keen to enable more offshore wind in the future.

Consenting. A clear regulatory regime, with a robust legislative framework is necessary to achieve an offshore wind market. This must be plan lead, policy and research driven, fit for purpose, intelligent, flexible and proportionate. This will deliver benefits for the regulator whilst recognising the need to adapt to technology, policy and market developments.

Provision of clear guidance should also support granting of consents that are robust, minimising the risk of lengthy post-consent delays due to legal challenges.

Marine planning. CWP notes and welcomes that Irish Government is consulting on new Marine Protected Areas. However, the MPA designation process must progress in parallel with the planning process for offshore wind, and that neither one hinders or slows down the other. CWP believes that care must be taken to explain that MPAs are not exclusion zones, but that in many cases co-habitation is possible, whether with or without specific mitigation measures.

Grid. The Irish Government has recently established the Offshore Grid Policy. This usefully explains how connections for the first three rounds of the Offshore RESS will be managed, and indeed funded. However, CWP believes that the next steps must be urgently addressed to ensure projects have sufficient time to develop their proposals prior to the first auction. This will include establishing the roles and responsibilities of the various stakeholders, establishing the specification of the connection, both in terms of physical infrastructure and regulatory structure, and confirming the proposed locations of connections and substation infrastructure. We believe therefore that EirGrid and CRU will need increased resource to manage this as well as the establishment of an offshore TSO.

## Marine Environment

Q68: What sort of role could Ireland's marine environment (lakes, seas) have in delivering climate mitigation? What are the building blocks that need to be put in place to support the role of the marine environment in climate mitigation (e.g. a regulatory framework, measurement and accounting rules)?

 Codling Wind Park Limited:

CWP believes that use of the marine environment will be vital in providing climate mitigation. There will be a number of factors to consider, but its use for renewable energy generation is of specific interest to CWP. CWP urges the Irish Government to set out clear legislation, regulation and guidelines to enable the development of offshore wind in a timely manner. It will be important to have clear goals which establish the purpose and potential uses of the marine environment. CWP would also like to note that habitat protection and offshore wind development is not necessarily mutually exclusive. This should be recognised as an opportunity where for example habitat enhancement coordinated by developers with input from relevant stakeholders could form part of project mitigation and monitoring strategies, and could therefore benefit certain sea areas.