

Commission for Regulation of Utilities  
The Grain House  
The Exchange  
Belgard Square North  
Tallaght  
Dublin 24

[By email to: electricityconnectionpolicy@cru.ie]

19 March 2024

A Chara,

**Re: CRU2024001 Review of Large Energy Users connection policy**

**Introduction**

1. The Irish Planning Institute (IPI) welcomes the opportunity to provide our views on the consultation paper on the review of Large Energy Users (LEU) connection policy. In particular the Institute wishes to comment regarding the approach to the location of LEUs.
2. Founded in 1975, the Irish Planning Institute is the all-island professional body representing professional planners engaged in physical, spatial and environmental planning in Ireland and Irish planners practicing overseas. Representing over 1,000 planners across the public and private sector, members of the Irish Planning Institute work in Local Authorities, An Bord Pleanála, Central Government, Regional Assemblies, Academia, in Private Practice as Consultants, for large developers and for semi state organisations.

**Alignment with Spatial Planning Policy**

3. The Institute is concerned that the consultation paper has limited integration with spatial planning policy and little regard for the potential land use planning implications of future LEU connection policy – particularly for those LEUs with significant employment potential and thus transport requirements.
4. It is essential that CRU LEU policy links with national, regional and local planning policy – especially the National Planning Framework which is currently being revised. The preferred location policy as articulated in the consultation paper fails to identify the spatial implications of such an approach. This includes considering the implications for our compact growth, regional development, sustainable transport, biodiversity, landscape and environmental objectives and obligations, all of which are required to be considered in forward planning and development management processes.
5. While there may be merit in locating new LEUs close to renewable generation and storage and in less constrained parts of the network, including from a balanced regional development perspective, given the varied profile of LEUs, a one size fits all approach is not appropriate. Any approach to individual projects must also align with relevant local development plan policy under the National Planning Framework.

**District Heating**

6. Regarding the discussion of district heating in the paper, it is unclear how waste heat from LEUs can be utilised in district heating if the preference is to locate them in less constrained locations, close to renewables, which are likely to be distant from population centres.

## Conclusion

7. The forthcoming CRU policy needs to be based on a partnership approach with stakeholders, including planning authorities, and must align with our national, local and regional planning policies. The Institute appreciates the opportunity to provide its views as part of consultation. If the Institute can be of any further assistance, please do not hesitate to contact us.

Is mise le meas,



Dr Seán O'Leary MIPI  
Senior Planner