Draft Clare CDP 2023-2029 - Public Consultation Portal

Submitted By: Anonymous user

Submitted Time: March 28, 2022 3:21 PM

Name

Sophie Nash

Address

RWE Renewables Ireland Limited Unit 5 Desart House, Lower New Street, Kilkenny City R95 H488

Email Address

[redacted]

Please confirm your Email Address

[redacted]

Volume 1

Climate Action and Renewable Energy

Volume 3(a) Ennis Municipal District Written Statements and Settlement Maps

Volume 3(b) Shannon Municipal District Written Statements and Settlement Maps

Volume 3(c) Killaloe Municipal District Written Statements and Settlement Maps

Volume 3(d) West Clare Municipal District Written Statements and Settlement Maps

Associated Documents

Volume 5 Clare Renewable Energy Strategy, Volume 6 Clare Wind Energy Strategy

Environmental Reports

None of the above

Your Submission

Location Map

Earthstar Geographics | Esri, FAO, NOAA

Powered by Esri

Upload Files

RWE Submission to Clare CDP 2023-2029.pdf, 0.26MB

28th March 2022

Ref: Submission on Draft Clare County Development Plan 2023 - 2029

To whom this may concern,

RWE are pleased to have the opportunity to have our consultation response submission considered in respect of the Draft Clare County Development Plan 2023 - 2029.

RWE Renewables Ireland is operating and developing a number of renewable projects in Ireland, across a range of renewable energy technologies including onshore wind, offshore wind solar and battery storage. RWE is now one of the world's leading producers of renewable energy and stands as the world's second largest offshore wind developer and third largest provider of renewable electricity across Europe, with a wealth of experience.

RWE fully support the feedback, comments and recommendations outlined in the Wind Energy Ireland (WEI) submission to this consultation process. RWE have reviewed the various sections of the Draft Clare County Development Plan 2023 - 2029 and associated documents and make this submission in accordance with section 11(2) of the Planning and Development Act 2000 (as amended) and focuses on Chapter 1, Chapter 3, Chapter 6, Chapter 8, Chapter 11, Volume 5: Clare Renewable Energy Strategy, Volume 6: Clare Wind Energy Strategy.

If you have any questions regarding our response, please do not hesitate to contact me.

We look forward to engaging in the next stages of this consultation process.

Yours faithfully,

Sophie Nash,
Graduate Renewables Developer,

*Online submission bears no signature

RWE Renewables Ireland Ltd

National Policy

The National Climate Action Plan (CAP) 2021 has set an ambitious 80% target for renewable energy production by 2030. To meet this target, the amount of electricity generated from renewables will have to double on current figures. Based on the CAP assumptions, onshore wind will provide the majority of the required electricity yield out to 2030. Taking account of this, Clare County Council and all Local Authorities should be cautious when considering the designation of areas for renewable energy development going forward, so as not to constrain any areas which may have renewable energy potential, particularly for wind generation.

To generate 80% of the country's electricity from renewable energy by 2030, the Government's Climate Action Plan requires the installation of 4,000MW of new onshore wind energy developments over the next decade. It took Ireland 20 years to install the first 4,000 MW of wind energy in Ireland.

Table 11.5 – *Potential Metrics to Deliver Further Abatement in Electricity*

Key Metrics	KPI 2030	Additional Abatement Impact, $MtCO_2eq.$
Core Measures		
Share of Renewable Electricity, %	Up to 80	6-8
Indicative Onshore Wind Capacity, GW	Up to ~8 *	
Indicative Offshore Wind Capacity, GW	At least ~5 *	
Indicative Solar PV Capacity, GW	~1.5-2.5 *	
Further Measures		
Zero-emission Gas Generation, TWh	1-3	0.2-0.4

* Electricity technologies will compete with each other on cost through competitive auctions

Wind Energy in Ireland

Ireland's 2020 energy target of 40% renewable electricity was a key driver in the development of wind power over the last decade. Having missed this target, the 2020s represent a critical decade for the development of onshore wind farms if we are to meet our national target of 80% of electricity generation from renewables by 2030.

Ireland has over 250 operational wind farms, which represents an investment of over €7 billion, regularly powering 65% of Ireland's electricity needs. The wind energy industry also supports 4,400 jobs and annually pays more than €30 million in commercial rates to local authorities. We are a country with enormous renewable energy resources and are world leaders at incorporating onshore wind into the national grid.

In 2018 wind energy avoided 3.1 million tonnes of CO_2 and cut €432 million off our fuel import bill[1] demonstrating the huge contribution that onshore wind is making to climate action. Wind energy decarbonises our electricity supply, cuts our import bill and drives down wholesale electricity prices. To achieve this, Ireland has built over 250 onshore wind farms, mostly since 2003, with a combined capacity of approximately 4,200 megawatts (MW) and over 2,500 wind turbines.

Onshore wind needs to continue growing in Ireland to meet future renewable energy targets with Ireland's Climate Action Plan 2021 proposing an increase from ~4200 MW at the end of 2020 to ~8200MW by 2030. That is why it is critical that the new Clare County Development Plan and Renewable Energy Strategy provides every opportunity for the development of wind energy.

At present, County Clare has installed capacity of c. 153 MW of onshore wind power. RWE commend Clare County Councils target of 850MW by 2030 from solar and onshore wind projects. County Clare has a key role to play in delivering a large share of the additional 4,000 MW of wind energy that will be required over the next decade.

European Context

The European Commission has proposed an outline of a plan to make Europe independent from Russian fossil fuels well before 2030, in light of Russia's invasion of Ukraine.

European Commission President Ursula von der Leyen stated:

"We need to act now to mitigate the impact of rising energy prices, diversify our gas supply for next winter and accelerate the clean energy transition. The quicker we switch to renewables and hydrogen, combined with more energy efficiency, the quicker we will be truly independent and master our energy system".

Executive Vice-President for the European Green Deal, Frans **Timmermans** said:

"It is time we tackle our vulnerabilities and rapidly become more independent in our energy choices. Let's dash into renewable energy at lightning speed. Renewables are a cheap, clean, and potentially endless source of energy and instead of funding the fossil fuel industry elsewhere, they create jobs here. Putin's war in Ukraine demonstrates the urgency of accelerating our clean energy transition."

1 https://www.seai.ie/publications/Energy-in-Ireland-2019-.pdf

The new geopolitical and energy market reality requires us to drastically accelerate the clean energy transition and increase Europe's energy independence from unreliable suppliers and volatile fossil fuels.

Following the invasion of Ukraine, the case for a rapid clean energy transition has never been stronger and clearer. The EU imports 90% of its gas consumption, with Russia providing around 45% of those imports, in varying levels across Member States. Russia also accounts for around 25% of oil imports and 45% of coal imports.[2]

Clare Wind Energy Strategy

2.6.1 Defining Areas for Wind Farm Development (Volume 6 Wind Energy Strategy)

Onshore wind energy is the largest contributor to total renewable energy generation in Co. Clare, which reflects the national status of wind energy contribution. There is currently an installed capacity of c. 153 MW of onshore wind power in the county.

With areas regarded as 'Strategic Sites' 'Acceptable in Principle' and 'Open to Consideration' in the Clare Wind Energy Strategy, viable wind speeds and proximity to grid were the top criteria applied to each zoning.

Increasing the areas designated as 'Strategic Sites' 'Acceptable in Principle' and 'Open to Consideration' should be considered by Clare County Council in the context of removing wind speed and grid capacity as a limiting factor. Due to improvement in wind technologies lower wind speeds can be harnessed and so wind resource should not be considered when designating strategic areas.
Grid capacity is a technical and electrical engineering constraint that is managed by the TSO/DSO and new infrastructure is often provided on the basis of there being a need to connect wind energy developments to the electricity grid, thereby further reinforcing grid infrastructure in counties where this work would not otherwise have occurred without wind energy development. As stated in 'Objective: Energy Security CDP11.44' Clare County Council agrees to the maintenance, development and upgrading of the electricity grid infrastructure within Clare County and so access to grid should not be considered a limiting factor when designating strategic areas.

[2] https://ec.europa.eu/commission/presscorner/detail/en/ip_22_1511

Chapter 1 Introduction and Vision

RWE has analysed Chapter 1 Introduction and Vision of the Draft Clare County Development Plan 2023- 2029 and we would like to comment on a number of the goals outlined in section 1.6.

'Goal I: A county that is resilient to climate change, plans for and adapts to climate change and flood risk, is the national leader in renewable energy generation, facilitates a low carbon future, supports energy efficiency and conservation and enables the decarbonisation of our lifestyles and economy.'

The very first goal outlined in this new plan outlines Clare County Councils intention to be resilient to climate change as well as being a county that is the national leader in renewable energy generation. Commendably, this outlines from the outset of the plan Clare County Councils intention to contribute positively to the climate change challenges that we are facing as well as being a leader within Ireland in that regard also. However, RWE is aware of a recent planning application near Miltown Malbay where an 8-turbine development was refused planning permission although being zoned in an area as Strategic in the Clare Wind Energy Strategy. RWE recognise that other factors such as residential amenity, property prices among others were considered here but questions the decision. Within this Clare has not prepared a new Wind Energy Strategy in anticipation of the New Wind Energy Guidelines, however RWE would question how a strategic area could still remain strategic despite the above-mentioned refusal and the obvious view and precedence Clare County Council has now set for any future applications in this area. As well as that, should this area now be being viewed as unsuitable for wind development, then other lands should be reconsidered for wind energy development going forward in order to meet renewable energy targets. RWE would urge Clare County Council not to wait for the impending Wind Energy Guidelines and to update their Wind Energy Strategy as part of the new 2023 – 2029 plan should they want to be the '*national leader*' outlined in Goal I of this draft plan.

RWE would like to commend Clare County Council on the below goals outlined in the draft plan also.

'Goal II: A county that drives local and regional sustainable growth by harnessing the potential of its unique location, quality of life, natural resources and other competitive advantages.'

'Goal VII: A county with diverse and strong rural communities and economy, where its natural resources are sustainably managed in a manner that is compatible with the fragility of rural areas and the existing quality of life.'

As per Goal II, harnessing Clare's potential in relation to natural resources is a very positive goal to be outlined in this draft plan. County Clare benefits from its geographic location on the West Coast of Ireland thus making its renewable energy potential in relation to wind very high. RWE commends Clare on this goal combined with Goal VII cited above also which outlines the ambition to become a county with a diverse rural community and economy.

With this in mind, RWE would urge Clare County Council to consider the opportunities existing with the development of renewable energy technologies such as onshore wind in the county. Considering the Renewable Energy Support Scheme (RESS) and the mandatory contribution of €2MWhr to a community benefit fund for local communities of wind farms, rural communities have an opportunity to generate significant additional funds which could be used in the local economy.

Chapter 3 Core Strategy

RWE commends Clare County Council on the below goal outlined in Chapter 3 – Core Strategy.

'Goal I: A County Clare that drives local and regional sustainable growth by harnessing the potential of its unique location, quality of life, natural resources and other competitive advantages.'

As is highlighted in Goal II of Chapter 1, Clare does indeed benefit in terms of its unique location and natural resources. That is in terms of its siting at the west coast of Ireland where there is a significant wind resource available in order to produce renewable energy and as a result contribute to the local and national economy. This 'competitive advantage' can help county Clare develop onshore wind developments and as a result contribute to national targets while the local economy will see significant investment and jobs created also.

Chapter 6 Economic Development and Enterprise

Within this chapter Clare County Council states that:

'Together with its Local Enterprise Office, the Clare Economic Taskforce and relevant stakeholders the Council will build on the economic strengths within the County and Region, will proactively pursue further economic development opportunities, will facilitate conditions that foster enterprise and enhanced resilience to economic vulnerabilities and that attract and retain high quality jobs that will allow for better standards of living.'

As is well known Renewable Energy projects contribute significantly to the Climate Action crisis which faces the world today. In 2019, approximately €501 million in fossil fuel imports were avoided by the use of Renewables of which €248 million was avoided by wind. Wind Generation avoided 3.9 million tonnes of CO2 emissions. These demonstrate the huge contribution that onshore wind is making to climate action. Wind energy decarbonises our electricity supply, cuts our import bill and drives down wholesale electricity prices. However, they can also make significant contributions to an economy both nationally and locally. The wind energy industry supports 4,400 jobs and annually pays more than €30 million in commercial rates to local authorities.

One of the strategic aims outlined in Chapter 6 is:
'To ensure that the benefits of economic growth and prosperity are spread to all parts of the County'.

Again, Renewable Energy projects will undoubtedly contribute to such economic growth and sustain county Clare long into the future.
RWE again commends Clare County Council on the following objective:

Development Plan Objective: Energy Supply CDP6.17
'It is an objective of Clare County Council:
a) To contribute to the economic development and enhanced employment opportunities in the county by:
i) Enabling the development of a self-sustaining, secure, reliable and efficient renewable energy supply and storage for the County in line with CDP Objective 3.1;
ii) Facilitating the county to become a leader in the production of sustainable and renewable energy for national and international consumption through research, technology development and innovation; and
iii) Supporting on-land and off-shore renewable energy production by a range of appropriate technologies in line with CDP Objective 3.1'

Chapter 8 Rural Development and Natural Resources

8.3.4 Renewable Energy

'*However, the development and siting of wind energy projects must be balanced with the potential impacts on the landscape, ecology and the amenities of local communities. Areas that are considered suitable for commercial wind energy developments are set out in Volume 6 of this Plan.*'

It is important to note that Wind Turbines are tall structures and if Ireland is to meet its 2030 targets the generation capacity of individual turbines will need to increase. Modern turbines are in the region of 170 – 185m in height, therefore such projects are inevitably going to be visible over wider areas and it is considered that this should not be a key criterial in considering whether a project is appropriate or not. Projects can be designed and laid out in a way that is sensitive to a particular landscape type. While we recognise the importance of protecting the character and quality of High Value Landscapes, further clarity should be provided to developers and decision makers on the sensitivity of the Scenic Routes in a particular location vis a vis wind farm development so that a plan-led approach can be applied to development, removing subjectivity.

RWE also recognise the importance of protecting biodiversity and ecology of a given location. As part of any planning application these factors will and should be given strict attention in the Environmental Impact Assessment Report (EIAR), but this ought to be assessed on a case-by-case basis to determine the impact of any given development. As mentioned, RWE support the protection of all biodiversity and expect all information presented in an applications EIARs to be assessed to determine the impacts associated with any development.

Chapter 11 Physical Infrastructure, Environment and Energy

11.8.5 Renewable Energy Sources

RWE commends Clare County Council on its current development of renewable energy with Clare already having an installed capacity of c. 153 MW of onshore wind power.

Considering Ireland's 2030 targets, it is critical that Clare's new County Development Plan reflects this ambition and lays down policies to facilitate their achievement.

'*The Clare Wind Energy Strategy identifies the optimum locations for wind energy developments in the County having regard to environmental and geographical constraints and the protection of the amenities of local residents. An updated Wind Energy Strategy will be prepared upon the publication of the update to the Wind Energy Guidelines for Planning Authorities 2006.*'

We urge Clare County Council to draft a new Wind Energy Strategy in response to significant delays in the publication of the Wind Energy Development Guidelines since 2019. The new Wind Energy Strategy should then be updated once the new Wind Energy Development Guidelines are published. A new Wind Energy Strategy would give developers more concise guidelines to ensure all projects going forward are in line with Clare County Councils objectives.

Objective: Energy Storage CDP11.51

'*a) To support and facilitate the development of secure, appropriately scaled energy storage facilities, particularly green hydrogen gas storage and pumped freshwater hydro energy storage, at suitable locations throughout the County, in compliance with the requirements of Objective CDP3.1 of this plan; and*

RWE commend Clare County Council on including an objective for energy storage. RWE would like to outline the importance of battery storage in Irelands energy transition to ensure a secure and steady energy network.

Development Plan Objective: Energy Security CDP11.44

'It is an objective of Clare County Council: To promote and facilitate the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure, to integrate renewable energy sources, thereby creating a secure and efficient energy supply and storage system for County Clare which is ready to meet increased demand as the regional economy grows.'

RWE commend Clare County Council on its recognition on the importance of upgrading electricity grid infrastructure within the County. As Irelands demand for energy increases due to electric transport and electric heating, Clare's grid infrastructure is going to require substantial development, maintenance and upgrading.

Chapter 13 Marine and Coastal Zone Management

RWE commends Clare County Council on the following objective:

Development Plan Objective: Offshore Renewable Energy (ORE) Development CDP13.5

'It is an objective of Clare County Council:

a) To support offshore wind, wave and tidal renewable energy developments and the ancillary land-based infrastructure and service requirements to assist in meeting renewable energy targets subject to environmental considerations and the protection of the amenities of the surrounding areas in accordance with the Offshore Renewable Energy Development Plan (OREDP), the ORE Planning policies as outlined in the National Marine Planning Framework (NMPF) and SIFP SEA Environmental Reports and the Natura Impact Reports; and

b) To support the redevelopment of the Moneypoint power generation station site as a green energy hub and the development of the Shannon Estuary as a focal point for the offshore wind industry in Europe'

Conclusion

The Draft Clare County Development Plan 2023 - 2029 should bring forward progressive policies and objectives that ensure that Clare can deliver its share of the national climate change and renewable energy targets intended to decarbonise the Irish economy in line with the National Planning Framework and Climate Action Plan. Clare County Council must be confident its policies and objectives as outlined in the Draft Plan so that they will be able to deliver on those national targets, as it is only through the individual policies, objectives and actions of the 31 Local Authorities across the country that the national targets can be achieved. This can be aided by highlighting specific targets of Renewable Energy for the duration of the plan and beyond in an effort to meet national targets of 80% electricity generation from renewable energy sources by 2030.

As well as this, as is noted in this submission, Clare County Council should prepare an updated Wind Energy Strategy as part of this plan. As is well known across the industry we are awaiting the updated Wind Energy Guidelines since the draft Guidelines were published in 2019. As of now there is no indication that these are going to be published anytime soon. Clare County Council should do their best to update their Wind Energy Strategy or at minimum be in a readily prepared position to update their WES should the guidelines be published throughout the drafting process of this plan.

Lastly, in relation to designating appropriate sites for wind farm development RWE would urge Clare County Council review their strategic designations particularly in relation to wind speeds and grid access. It is advocated that such factors should be removed from the criteria applied to each zoning due to improvements in wind turbine and grid infrastructure technologies.