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Wind Energy Ireland Submission on Draft Stage of Clare County Development Plan 2023 - 2029

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1. Introduction

Wind Energy Ireland (formerly the Irish Wind Energy Association) welcomes the opportunity to make this submission to Clare County Council on the Draft Clare County Development Plan 2023-2029 ('draft Plan'). This submission has been prepared in accordance with section 11(2) of the Planning and Development Act 2000 (as amended) and focuses on key strategic area that should be considered in the preparation of the County Development Plan.

1.1 Submission Structure

After a detailed review of the draft Plan, Wind Energy Ireland (WEI) wish to make specific comments to the following sections:

- Chapter 1 Introduction and Vision
- Chapter 3 Core Strategy
- Chapter 6 Economic Development and Enterprise
- Chapter 8 Rural Development and Natural Resources
- Volume 5: Clare Renewable Energy Strategy
- Volume 6: Clare Wind Energy Strategy

Our comments and recommendations to these specific sections are described further in Section 2.

1.2 WEI and Wind Energy in Ireland

Wind Energy Ireland (WEI) is the representative body for the Irish wind industry, working to promote wind energy as an essential, economical, and environmentally friendly part of the country's low-carbon energy future. We are Ireland's largest renewable energy organisation with more than 150 members who have come together to plan, build, operate and support the development of the country's chief renewable energy resource.

Ireland has just over 300 operational wind farms[1], which represents an investment of over €7 billion, regularly powering 65% of Ireland's electricity needs. The wind energy industry also supports 5,000 jobs and annually pays more than €45 million in commercial rates to local authorities[2]. We are a country with enormous renewable energy resources and are world leaders at incorporating onshore wind onto the national electricity grid.

Renewable energy provided 43 per cent of Ireland's electricity in 2020, with over 38 per cent of this coming from wind energy[3]. This is the highest share of electricity being provided by onshore wind in Europe, and this is expected to rise as we decarbonise our electricity system. In 2018 wind energy avoided 3.1 million tonnes of CO_2 and cut €432 million off our fuel import bill[4] 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 300 onshore wind farms, mostly since 2003, with a combined capacity of approximately 4,300 megawatts (MW) and over 2,500 wind turbines. Even though these wind farms are supplying Ireland with the highest share of onshore wind in any EU electricity system, the resource in Ireland is so large that Ireland's turbine density

[1] Based on EirGrid generation reference numbers
[2] Economic impact of onshore wind in Ireland - KPMG - https://windenergyireland.com/images/files/economic-impact-of-onshore-wind-in-ireland.pdf
[3] http://www.eirgridgroup.com/newsroom/electricity-consumption-f/index.xml
[4] https://www.seai.ie/publications/Energy-in-Ireland-2019-.pdf

is relatively low by other EU standards. Due to a delay between the end of the REFIT (Renewable Energy Feed-In Tariff) scheme and start of the new Renewable Electricity Support Scheme (RESS), only c.135MW was installed during 2020.

Five other EU countries have a higher number of turbines per square kilometre than Ireland, as shown in Figure 2, suggesting there is still potential for further growth.

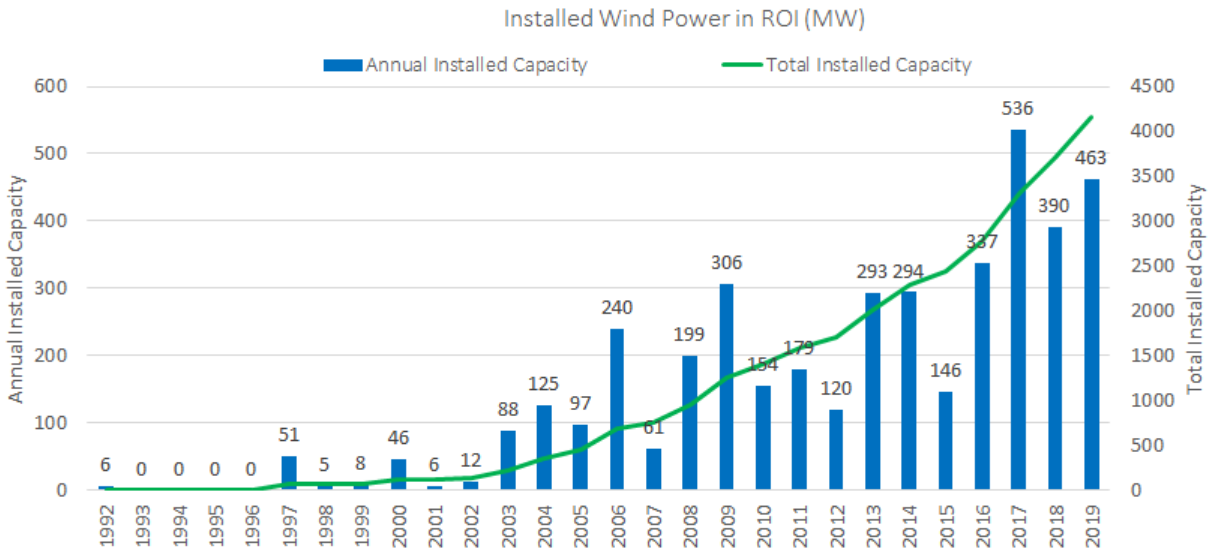

Figure 1: Installed capacity of onshore wind in Ireland since 1992.

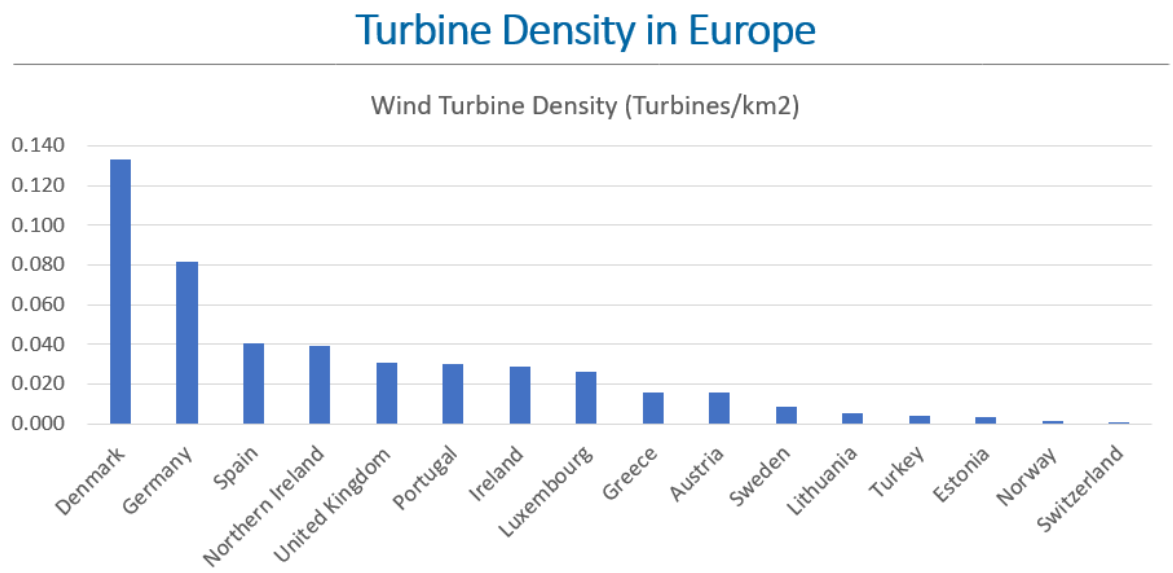

Figure 2: Turbine density in various European countries.

Onshore wind needs to continue growing in Ireland to meet future renewable energy targets with Ireland's Climate Action Plan proposing an increase from ~4200 MW at the end of 2020 to ~8200MW by 2030.

1.3 Carbon Emissions and Renewable Energy Targets

On the 9th August 2021, the Intergovernmental Panel on Climate Change (IPCC) published its 6th Assessment Report (AR6) with the overarching assertion that, "It is unequivocal that human influence has warmed the atmosphere, ocean and land". This report confirms with alarming certainty the detrimental and linear relationship of CO2 emissions and global temperature rise in D1.1:

"*This Report reaffirms with high confidence the AR5 finding that there is a near-linear relationship between cumulative anthropogenic CO2 emissions and the global warming they cause.....This relationship implies that reaching net zero anthropogenic CO2 emissions is a requirement to stabilize human-induced global temperature increase at any level, but that limiting global temperature increase to a specific level would imply limiting cumulative CO2 emissions to within a carbon budget*."

The detrimental effects of rising global temperatures are evidenced in regionally intensified weather patterns. Severe heat waves that happened only once every 50 years are now happening roughly once a decade. Tropical cyclones are getting stronger. Most land areas are seeing more rain or snow fall in a year. Severe droughts are happening 1.7 times as often while fire seasons are getting longer and more intense. Ireland is not immune to these climatic changes, with average temperatures exceeding long-term averages in 23 of the past 25 years. The urgency with which Ireland and the rest of the world need to tackle climate breakdown is clear and reflected in our national targets outlined below, with the electricity sector a key component in reaching decarbonization.

The criticality of onshore wind in Ireland's energy mix is apparent when the near-term trajectories in the Clean Energy Package Governance Regulation (2018) are considered. This requires all member states to submit National Energy and Climate Plans (NECP) setting out how each member state will contribute to the decarbonisation objectives of the European Union. Section (34) of the document notes (emphasis added):

"*Integrated national energy and climate plans should be stable to ensure the transparency and predictability of national policies and measures in order to ensure investment certainty. National plans should however be updated once during the ten-year period covered to give Member States the opportunity to adapt to significant changing circumstances. For the plans covering the period 2021 to 2030, Member States should update their plans by 30 June 2024. Objectives, targets and contributions should only be modified to reflect an increased overall ambition in particular as regards the 2030 targets for energy and climate. As part of the updates, Member States should make efforts to mitigate any adverse environmental impacts that become apparent as part of the integrated reporting*".

In addition, on the 17th of June 2019 the Government published the '*Climate Action Plan 2019*' (CAP). This sets out the agreed course of action over the coming years to tackle climate breakdown. It is a visionary and transformational plan and at its heart recognises that "We [Ireland] are close to a tipping point" and "decarbonisation is now a must if the world is to contain the damage and build resilience in the face of such a profound challenge." (Exec. Summary pg. 8). In particular, the CAP places the decarbonisation of the electricity sector at the centre of its ambitions. In real terms it mandates this sector to move from 12 million tonnes of CO2 equivalent emissions in 2017, to 4.5 million tonnes by 2030. In other words, a massive reduction of 7.5 million tonnes (62.5%).

Following on from the 2019 CAP, the Government published the National Development Plan 2021 – 2030 (NDP) on the 4th of October 2021 which increases Ireland's renewable electricity target to 80% by 2030 from the previous target of 70%. To achieve this **new 80% target**, the NDP

earmarks a target of 5GW offshore wind and **a doubling of existing onshore wind from circa 4GW (today) to 8GW by 2030, signalling onshore wind as crucial in the roadmap to decarbonization. This increase to 80% should serve as a key policy indicator for onshore wind development going forward.** To put the scale of the ambition into further context it should be noted that it has taken 20+ years to achieve the current level of renewable penetration onto the Grid. The challenge is now to achieve twice as much in half the time. This is of particular significance in the context of the lifetime of the draft Plan to 2028.

It should also be noted that the 2020 programme for government commits to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) and to move to net zero emissions by 2050. The 2050 target was set into law by the Climate Action and Low Carbon (Amendment) Bill 2021 as passed through the Oireachtas and signed into law 23rd July, 2021. This bill proposes a strengthened role for the Climate Change Advisory Council, proposes an annually revision of the Climate Action Plan and new oversight and accountability by the Oireachtas. Every sector, including the energy sector, must contribute to meeting the 2050 target by implementing policy changes as outlined throughout the programme for government.

WEI believes that planners working in all tiers of government (national, regional, local) and the planning profession in general needs to step forward and frame this national CO_2 reduction ambition and the associated requirement for renewable energy.

The targets discussed will not be achievable without a functioning onshore and offshore wind sector, and there is likely to be considerable reliance on onshore wind to deliver on our intermediate targets to 2025 and 2027. Given the relatively high likelihood that a significant portion of new offshore capacity will only start to be delivered onto the system post 2027, these requirements clearly point to a need to maintain focus on the delivery of new onshore capacity, which will be better placed to support these earlier intermediate targets, in addition to making

a material ongoing contribution to the long term decarbonisation targets. Consideration should also be given to how best to facilitate offshore wind energy projects in development which will make a significant contribution towards reducing targets towards the end of the decade. This is well reflected in the chapter on Marine Renewables.

1.4 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."

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 Key Considerations

WEI welcomes the detailed Draft Renewable Energy Strategy associated with the Draft County Development Plan 2023-2029. This strategy recognises the legislation and policy that underpins the approach to renewable energy, although the increase in the renewable energy target from 70% to 80% as set out in the Climate Action Plan is not stated in the Policy section). There is a detailed assessment of the various technologies that can contribute to renewable energy generation and target capacities are set for each of these technologies.

In general, the context for the legislation and policy chapter is not clearly set out. This is important as it helps to understand why it is imperative that we develop renewable energy generators and reduce greenhouse gas emissions. Ireland declared a climate and biodiversity emergency in May 2019. Further to this, in response to the war in Ukraine, the European Commission has stated that,

'The commission calls on member states to ensure that the planning, construction and operation of plants for the production of energy from renewable sources, their connection to the grid and the related grid itself, are considered as being in the overriding public interest and in the interest of public safety and qualify for the most favourable procedure available in their planning and permitting procedures'. It is important to reflect the context supporting all the international and national policy.

The Wind Energy Strategy for County Clare has not been updated from the version incorporated into the Clare County Development Plan 2017-2023. It is stated that this will be reviewed and updated once new Wind Energy Development Guidelines are issued. The Wind Energy Strategy is a well-considered and clearly sets out preferred areas for wind energy development along with

target capacities, in line with the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, (Dept. of Housing, Planning, Community and Local Government*) July 2017. This sets out a target wind energy capacity of 550 MW. However, Tables 4.4 and 4.5 in the Draft Renewable Energy Strategy set out that there is already approximately 500 MW of installed and permitted capacity in Co. Clare.

While the Wind Energy Strategy (Section 3.2) states that Clare County Council will aim to achieve a minimum target of 550 MW from wind energy by the conclusion of the strategy, a statement acknowledging that additional capacity will be considered and facilitated in accordance with the principles of the existing Wind Energy Strategy would be welcome. It would also be useful to set an objective to review the Wind Energy Strategy within a set time e.g. nine months of the publication of the new Wind Energy Development Guidelines or alternatively, within 1 year of the adoption of the Draft Development Plan 2023-2029 if the new guidelines have not been published by then.

WEI 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. WEI 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, WEI 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.

WEI 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.

Within Chapter 6 Economic Development and Enterprise Clare County Council states:

'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.

WEI 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'

In Chapter 8 Rural Development and Natural Resources:

'*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.

WEI 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, WEI 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.

2.1 A Regional Approach

WEI acknowledges that Clare County Council is only responsible for its own functional area however, WEI would like to highlight the importance that the county fit into a regional and national planning policy context that may be in place in the future.

WEI has been advocating for a regional-approach to the spatial planning of wind farm developments for some time, to compliment the Local Authority-level approach that has been the case to-date. WEI previously prepared a Discussion Document (available upon request) on this specific topic which outlines the following benefits of a regional approach:

- It fits within and neatly compliments the Regional Spatial and Economic Strategies (RSES) now prepared for the three regions. (As the three RSES policy documents have now been formally adopted, spatial plans for renewable energy projects can be progressed as supplementary work streams by the Regional Assemblies and compliment the RSES).
- A single, consistent methodology can be used across an entire region and across all three regions in the country, including across county and local authority boundary areas where approaches to-date have been inconsistent in many cases.
- A regional approach would ensure that the optimum locations for wind energy development are identified, and every county's potential is assessed in a regional and national context, in direct comparison with the rest of the region.
- It would ensure that national targets, objectives and requirements for the delivery of wind energy, directly translate into the identification of suitable areas and corridors, and a sufficient quantum of land is identified and deemed appropriate to ensure national targets, objectives and requirements can be delivered.
- Landscape sensitivity, value and capacity can be assessed on a broader, regional scale, rather than just within the sometimes-limited confines of an individual county. This would provide consistent, evidence-based landscape policies across local authority areas, and ensure the appropriate landscape policies are implemented irrespective of the county boundaries. This would ensure that

wind and other electricity infrastructure projects that span or are visible across county boundaries, can be assessed in a consistent landscape policy context.

- Landscape sensitivity and capacity assessments could be undertaken for wind energy and other electricity infrastructure on a regional basis, without needing the National Landscape Strategy to be completed. While the National Landscape Strategy will have to provide for all forms of development and types of land uses, the assessment of landscape sensitivity and capacity specifically for wind energy and electricity infrastructure is a much more defined work stream, that could be progressed in advance. Existing Local Authority landscape policies can be used to align landscape values across a region, to ensure existing local policy is fully considered when moving to a regional approach for the assessment of landscape sensitivity and capacity for wind energy and other electricity infrastructure.

A regional approach to the spatial planning for wind energy was suggested by WEI as far back as March 2018 and is still considered vital if the transition to a low carbon economy in the coming years is to be successful. WEI maintains it is essential to plan for this transition, on the basis of the three Regional Assembly areas, in addition to the 31 Local Authority areas as has been the case to-date. The regional approach would undoubtedly provide a more appropriate platform for ensuring national policy can be transposed effectively to local level, and ensure a consistent approach is used across the entire country that reflects Government policy.

In addition to the Local Authority-based approach to incorporating renewable strategies into their respective development plans, to compliment the Renewable Electricity Policy and Development Framework (REPDF) currently being prepared by the Department of Environment Climate and Communications (DECC), WEI will continue to advocate for the preparation of Regional Renewable Energy Strategies to be accelerated and prioritised by the three Regional Assemblies. Only the Regional Renewable Energy Strategies can ensure that a sufficient quantum of land within each region is identified as having wind energy potential sufficient to meet the national requirements.

3 Conclusion

Clare's County Development Plan should enhance the progressive policies and objectives that ensure the county can deliver as much as possible 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.

WEI thanks Clare County Council for the opportunity to engage on these matters and welcome any clarifications that may arise.

ENDS