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GREENSOURCE

Clare County Council

Greensource Submission to Review of Clare County Development Plan – November 2020

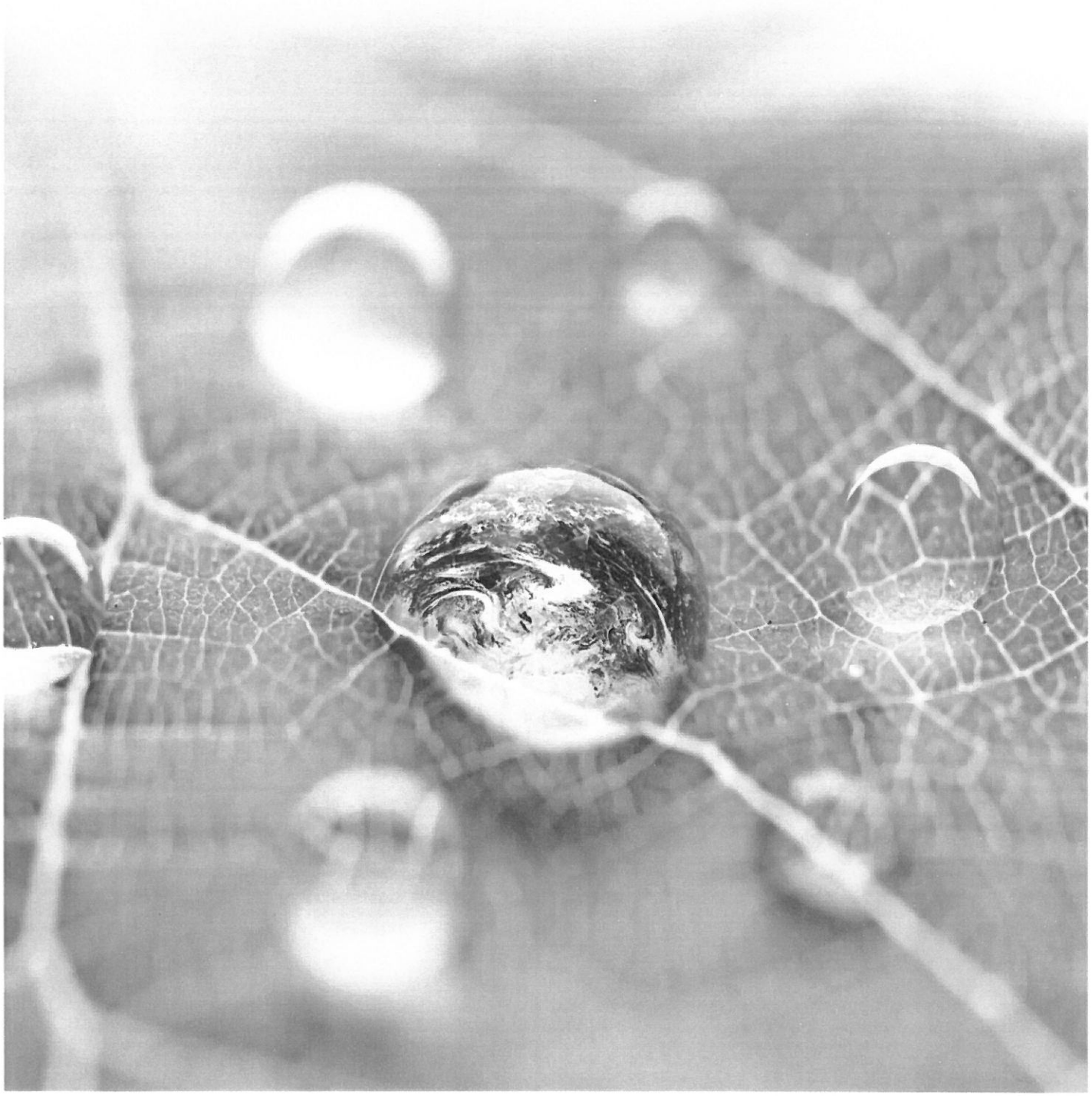

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Table of contents

1 INTRODUCTION 1
2 GREENSOURCE ENERGY – COMPANY BACKGROUND 1
3 CLARE COUNTY DEVELOPMENT PLAN REVIEW PROCESS 2
4 POLICY AND LEGISLATION 3
4.1 International 3
4.2 European 3
4.3 National 3
4.4 Regional 4
4.5 Local 6
4.5.1 Clare County Renewable Energy Strategy 2017 6
4.5.2 Shannon Estuary Strategic Integrated Plan 7
4.5.3 Clare County Development Plan 7
5 RENEWABLE ENERGY INFRASTRUTURE IN COUNTY CLARE 8
6 PROPOSED CLARE DEVELOPMENT PLAN 2022 – 2028 8
7 OPPORTUNITIES FOR COUNTY CLARE 8
8 DEVELOPMENT PLAN OBJECTIVES AND POLICIES – PROPOSED ENHANCEMENTS ... 11
9 CONCLUDING STATEMENT 12

1 INTRODUCTION

Clare County Council is commencing the preparation of the Clare County Development Plan 2022-2028. The revised Development Plan is an important blueprint for the development of Clare from a physical, economic, social, and environmental viewpoint. The process includes a review of the existing Clare County Development Plan and will set out the overall strategy for the sustainable development of Clare for the period up to 2028. The development plan review process has a series of steps and this submission is framed to inform the Strategic Issues Paper issued in Mid-September 2020. The Strategic Issues Paper is the first step in stimulating engagement on the upcoming revised County Development Plan 2022 – 2028.

2 GREENSOURCE ENERGY – COMPANY BACKGROUND

Greensource is a renewable energy company with origins on a dairy and poultry farm in Shanagolden, County Limerick. The company has grown and diversified over the last twenty years, with significant expertise in the planning, construction and operation of renewable energy projects in Ireland and abroad. Since inception, the company has played a key role in the development of over 150 MW of renewable energy projects in Ireland, playing a significant role in further decarbonising the electricity market in this country.

Greensource has developed a fleet of renewable energy projects including wind and biogas, involving one of the first, state of the art farm scale anaerobic digestion plants in Ireland, which has been operational since 2010. The GreenGas Anaerobic Digestion Plant developed in Shanagolden, County Limerick processes manure and slurry as well as other imported feedstock to convert these materials into energy, adding 1MW of renewable electricity generation in Limerick. This plant is one of two AD installations operational in Limerick, the second based on the conversion of biogas generated from wastewater treatment into electricity. The GreenGas plant would not have been developed without the close co-operation of combined local authorities in Limerick County and provided a roadmap for the development of farm scale anaerobic digestion plants in Ireland.

Greensource has developed and installed two wind farm projects in County Clare to date, Loop Head and Tullabrack Windfarms. These projects have been operational since 2015 and 2018 respectively. These wind farms have provided great educational benefits by hosting numerous school tours from the neighbouring communities. Both wind farm sites were developed with close co-operation from the local communities particularly from landowners who either provided some of the site or enabled the grid connection line to be constructed through their property..

Greensource believes a major focus is required on the benefit to communities in the vicinity of renewable energy projects. Greensource has a strong affiliation to community benefit from the projects developed, with neighbouring communities having benefitted by in excess of €100,000 to date from these projects. The involvement of local communities and the development of community renewable energy projects will be key in ensuring renewable electricity targets are achieved. The development of small scale (<5MW) community renewable energy projects in Clare, on both private

and commercial lands will provide educational, economic and employment opportunities in local communities.

The benefits of such an approach are already evident in County Tipperary, with Ireland's first community owned windfarm, Templederry Community Windfarm in operation. Greensource provided a small advisory role in the development phase of this project and are therefore cognisant of the challenges and opportunities present for community renewable energy projects.

3 CLARE COUNTY DEVELOPMENT PLAN REVIEW PROCESS

The review of the Clare County Development Plan commenced in Mid-September 2020 with the issuing of the Strategic Issues Paper as part of the Pre-Draft Public Consultation Phase. This first stage in the process has a focus on seeking engagement on objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the county. The county council is seeking submissions/observations that are strategic in nature and focus on 'big picture' issues.

The Strategic Issues Paper identifies a number of themes for consideration :

- Population and Housing
- Economic Enterprise, Tourism, and Retail Development
- Towns and Villages
- Rural Development
- Transport and Infastructure
- Built and Natural Heritage, Landscape and Green Infastructure
- Climate Change, Renewable Energy and Environment
- Social, Community and Cultural Development

The ongoing development of renewable energy and green infrastructure is interwoven with all 8 themes outlined above.

The following are some of the key issues that should be considered in the preparation of first draft of the development plan in terms of Energy.

- Sustainable development
- Policies and objectives that tackle the onset of climate change
- Sustaining business and economy, while protecting or enhancing our environment
- Security of supply in terms of Energy with specific consideration given to the changes at Moneypoint Powerstation and the surrounding Transmission and Distribution Infastructure
- Sustaining rural Ireland population and providing local employment
- A comprehensive review of the current Zoning Classifications to ensure that existing "Strategic" and "Acceptable In Principle" areas are maintained and "Open to Consideration" areas are reassessed to provide sufficient lands to facilitate the ongoing delivery of wind energy projects.

4 POLICY AND LEGISLATION

4.1 INTERNATIONAL

Agenda 2030 Sustainable Development Goals and The Paris Agreement on climate change require a transformational shift of our economies and societies towards climate resilient and sustainable development. In light of the issues of energy security and possible future resource constraints and the issue of global warming, the renewable energy sector looks set to play a bigger role in the economic and infrastructural future of our country.

4.2 EUROPEAN

The Irish government supports the ambition within the European Union (The European Green Deal) to achieve a net zero target by 2050 and the pathway to 2030 which would be consistent with a net zero target by 2030.

The European Green Deal provides an action plan to

- Boost the efficient use of resources by moving to a clean, circular economy
- Restore biodiversity and cut pollution

The plan outlines investments needed and financing tools available. It explains how to ensure a just and inclusive transition.

The EU aims to be climate neutral in 2050. Reaching this target will require action by all sectors of our European country economies, including

- Investing in environmentally-friendly technologies
- Supporting industry to innovate
- Rolling out cleaner, cheaper and healthier forms of private and public transport
- Decarbonising the energy sector
- Ensuring buildings are more energy efficient
- Working with international partners to improve global environmental standards

The EU will also provide financial support and technical assistance to help those that are most affected by the move towards the green economy. This is called the Just Transition Mechanism. It will help mobilise at least €100 billion over the period 2021-2027 in the most affected regions.

Ireland through its national policies and legislation along with regional and county development plans will provide a strong planning framework that will provide a pathway for investment and change. The new Clare County Development Plan should have the key mechanisms, policy or objectives that are aligned with the European Green Deal so we can maximise the benefit to society.

4.3 NATIONAL

The Clare County Development Plan will be guided by the UN Sustainable Development Goals and will be consistent with the National Planning Framework 'Project Ireland 2040' and the Regional Spatial and Economic Strategy for the Southern Region in areas such as climate action and clean energy.

The transition to a low carbon electricity system, based on renewable energy generation and storage is a key pillar of Project Ireland 2040 – National Planning Framework. The requirement for energy security and climate action has led to increased focus on renewable energy generation in Ireland.

In 2019, wind generation provided 32.5% of the electricity generated in Ireland, up from 25% in 2017. It is well recognised that Ireland has excellent renewable energy resources, with technologies such as offshore wind, tidal etc. remaining vastly untapped. Other technologies such as solar have seen major developments, with numerous projects receiving successful grants of planning permission in the Munster Region and 12 Solar projects planned for Clare. It is envisaged the first of these developments will start construction in the next year. The predominant source for renewable energy production in Clare remains wind generation, with 13 wind farms in operation producing approximately 240MW of clean energy

In order to achieve climate action goals, the development of further renewable energy projects is required, along with the diversification of associated technologies. There is an obligation to increase reliance from 30% to 70%, adding 12GW of renewable energy capacity (with peat and coal plants) closing across the country. There is a requirement to enable community participation in renewable generation, along with streamlining consent systems and connection arrangements. The strategic location of Clare along the western seaboard, together with the ports of Moneypoint and Limerick, provides substantial opportunities for the development of on and off shore renewable energy technologies. Continued support of renewable energy technologies and associated infrastructure will be required as part of the proposed Clare County Development Plan 2022-2028 to ensure local and national needs are met, with specific consideration given to the changing energy supply from Moneypoint Powerstation.

The Climate Action Plan 2019, issued by the Department of Communications, Climate Action & Environment recognises that Ireland must significantly step up its commitments to tackle climate disruption, with a local authority leadership role required to achieve decarbonisation goals. The Climate Action Plan 2019, sets out objectives in relation to renewable electricity:

- Increase reliance on renewables from 30% to 70% adding 12GW of renewable energy capacity (with peat and coal plants closing) with some of this delivered by private contracts.
- Put in place a coherent support scheme for micro-generation with a price for selling power to the grid.
- Open up opportunity for community participation in renewable generation as well as community gain arrangements.

4.4 REGIONAL

The Regional Spatial and Economic Strategy for the Southern Region has polices that relate directly to energy infrastructure and renewable energy.

One key aspect of renewables that will have to be taken into account is the Offshore Renewable Energy Development Plan which has been emerging since the preparation of the last Development Plan. It will be necessary for any off shore renewables to be supported from land with Moneypoint Port and Limerick Port and the region as a whole ideally placed to carry out this function. The following sets out the primary objectives that are relevant to energy.

Regional Policy Objective 85 - Renewable offshore energy seeks to promote regional cooperation in terms of offshore renewable energy development, environmental monitoring and awareness of the benefits of realising the Region's offshore energy potential. Initiatives arising from this objective shall be subject to robust feasibility and site selection, which includes explicit consideration of likely significant effects on European Sites and potential for adverse effects on the integrity of European sites in advance of any development.

Regional Policy Objective 95-Sustainable Renewable Energy Generation sets out that it is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.

Regional Policy Objective 96-Integrating Renewable Energy Sources states that it is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate a renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.

Regional Policy Objective 99 – Renewable Wind Energy: It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.

Regional Policy Objective 100 – Indigenous Renewable Energy Production and Grid Injection. It is an objective to support the integration of indigenous renewable energy production and grid injection.

Regional Policy Objective 104 – Energy Storage and Carbon Capture - It is an objective to support investment in initiatives to develop innovation, advances in technology and pilot projects for the sustainable development of energy storage and carbon capture within the Region and to work with key stakeholders in developing sustainable forestry, including initiatives for native tree planting and better management of peat land and soil management to support carbon sequestration and enhancement of biodiversity.

In Regional Planning Objective (RPO) 119 New Energy Infrastructure - it is stated that; It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.

Regional Policy Objective 222 Renewable Energy Generation and Transmission Network sets out that:

(a). Local Authority City and County Development Plans shall support the sustainable development of renewable energy generation and demand centres such as data centres which can be serviced with a renewable energy source (subject to appropriate environmental assessment and the planning process) to spatially suitable locations to ensure efficient use of the existing transmission network;

(b). The RSES supports strengthened and sustainable local/community renewable energy networks, micro renewable generation, climate smart countryside projects and connections from such initiatives to the grid. The potential for sustainable local/community energy projects and micro generation to both mitigate climate change and to reduce fuel poverty is also supported;

(c). The RSES supports the Southern Region as a Carbon Neutral Energy Region.

Regional Policy Objective 224 states the following:

Delivery of Energy Networks - Local Authorities shall work in partnership with existing service providers to facilitate required enhancement and upgrading of existing infrastructure and networks (subject to appropriate environmental assessment and the planning process) and support the safeguarding of strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks.

4.5 LOCAL

4.5.1 Clare County Renewable Energy Strategy 2017

In the 2017 Renewable Energy Strategy Clare County Council set out its vision to harness all of the sources of renewable energy that are replenished through cycles of nature. These sources are infinite and can provide not only green energy but provide economic stability, jobs, investment opportunities, safeguard the development of communities and protect Clares built and natural heritage sites. The diminishing reliance on fossil fuels gives rise to combating the effects of global warming and climate change.

Greensource welcomes the opportunity to work with Clare County Council in the development of these natural resources to maintain the progress already made and provide a stable energy supply for all.

The 2017 Wind Energy Strategy took into consideration wind speed as an exclusion criterion. As technologies have advanced, turbines have been developed which can yield the same energy from lower wind sites than their older counter parts. Greensource recommend that continuing to use wind resource data when developing and zoning areas is not relevant for renewable energy development.

Greensource also believe that grid constraints should not be considered by the local authority in the preparation of the County Development Plan as this is identified as a developer's constraint. We ask that this is taken into consideration in the Clare County Development Plan 2022-2028.

4.5.2 Shannon Estuary Strategic Integrated Plan

The Shannon Estuary Strategic Integrated Framework Plan (SIFP) was published in 2013 providing a framework to guide the future development and management of the Shannon Estuary. The strategy encourages and promotes a balanced approach to harnessing the growth potential of the estuary, whilst also ensuring protection and management of the natural environment of the area. The development of the Shannon Estuary region will place further emphasis on energy requirements and security in the area, with renewable energy projects key to ensuring future energy requirements are met sustainably. The SIFP identifies the opportunity present in the estuary to take advantage of the future growth of the offshore renewable energy sector and associated infrastructure.

4.5.3 Clare County Development Plan

As set out in the Climate Action and Low Carbon Development (Amendment) Bill 2020, each local authority will be requested to make a plan relating to climate action. This plan will specify the mitigation measures and the adaption measures to be adopted by the local authority, with regard to national frameworks and policies on climate change. Renewable energy strategies and the ongoing support of renewable energy projects within the local authority area will be key in achieving climate action and development of a low carbon economy.

The transition and implementation of the development plan is interlinked with national and European policies such as the European Green Deal, which outlines a roadmap for making the European economy sustainable, turning climate and environmental challenges into opportunities.

The implementation of the new Clare County Development Plan 2022-2028 has the potential to provide significant opportunities for habitat restoration and enhancement, sustainable agriculture through landowner income associated with renewable energy developments and rural development as a result of community benefit funds associated with renewable energy developments.

That is why it is critical that the Clare Development Plan 2022-2028 provides every opportunity to get as many projects through the planning and approvals system, to enable renewable energy targets to be achieved. There is a requirement to enable community participation in renewable generation, along with streamlining consent systems and connection arrangements. The strategic location of Clare along the western seaboard, together with the ports of Moneypoint and Limerick, provides substantial opportunities for the development of on and off shore renewable energy technologies. Continued support of renewable energy technologies and associated infrastructure

will be required as part of the proposed Clare Development Plan 2022-2028 to ensure local and national needs are met.

In supporting the objectives of the Climate Action Plan 2019, acknowledgement must be given to the existing renewable energy developments in operation in County Clare and the requirement for the addition of further renewable energy developments and the technological diversification of such developments including bio-mass, wind power, small scale hydro power, wave power, anaerobic digestion, solar PV, hydrogen and other such technologies which may emerge over the period of this development plan. The contribution of small scale renewables including domestic and agricultural is likely to grow.

5 RENEWABLE ENERGY INFRASTRUTURE IN COUNTY CLARE

Currently, there are 13 operational wind farms located in Clare, producing in excess of 240MW of renewable electricity. These are mainly distributed in the south west of the County. As of September 2020, there are no operational solar farms in the County, however 11 solar projects have received conditional planning permission from Clare County Council. These 11 projects have the potential of adding a further 159.46MW to the renewable energy generated in Clare.

The development of the permitted solar projects has the potential to increase the overall installed capacity to approximately 399.46MW.

6 PROPOSED CLARE DEVELOPMENT PLAN 2022 – 2028

Clare County Council has commenced the preparation of the Clare Development Plan 2022-2028 in publishing the Strategic Issues Paper and associated background papers for review and to encourage submissions and proposals from the public and interested parties.

The preparation of the Clare Development Plan is one of the most important functions of the council acting as the blueprint for the development of Clare from a physical, economic, social and environmental viewpoint. The process includes a review of the existing Development Plans and will set out the overall strategy for the proper planning and sustainable development of Clare as a whole over a six year period up to 2028.

The development of the new county development plan will be informed and guided by existing policy and legislation, but will also build on the work completed in the previous plans.

7 OPPORTUNITIES FOR COUNTY CLARE

In developing a new Clare County Development Plan the future is being set out through policies, objectives and zoning. The process of reviewing the previous development plans and developing the fundamentals of the new plan will in itself identify challenges but also opportunities for the county.

Greensource strongly believe that Clare County Council should adhere to the National Wind Energy Planning Guidelines which sets out recommendations in terms of siting and conditions at which wind farms should adhere to. It should not recommend minimum setbacks for projects from homes or properties but instead, as mentioned, follow the national guidance. A number of counties who attempted to set their own rules on wind farm developments had to be overruled by the Minister. These County Development Plans were also subject to judicial review those in the renewable industry. Ultimately, deviation from national guidelines would inhibit renewable energy development.

One area that national guidelines recommends on is that *"The inclusion of a condition which limits the life span of a wind energy development should be avoided, except in exceptional circumstances".* Local authorities have ignored this guidance in many planning permissions and have often limited permissions operating life span to 25 years. Wind energy technology has made major advancements in the last decade and now turbine technologies have design lives of 30 - 35 years. Putting conditions limiting operating periods to 25 years is increasing the cost of energy to the consumer as wind farms are being forced to decommission before the end of their natural lives. Greensource strongly recommend that the new CDP should recognise the guidance in national guidelines but if it is deemed that a condition limiting the operating period of a wind farm should be applied to a planning permission then that limit should be no less than 35 years.

In terms of renewable energy, the challenges ahead are clear if we are to make our national targets and de-carbonise our economy. While we won't achieve everything in the short term it is essential that there is a long-term plan with clear targets and a mechanism through the planning process to deliver projects.

In developing the first draft of the proposed Clare County Development Plan 2022 – 2028 we request the Local Authority be mindful or take into account the following potential gains that can be achieved with an integrated plan for renewable energy in the near future.

The following are some of the main opportunities that will arise:

- Increased generation of Green Energy in the county across all technologies.
- Continued Investment in projects and in the local economy.
- Guaranteed income stream of €2 per megawatt hour from generation that is ring fenced for communities.
- Increased and continuous income from rates from wind farm projects providing a valuable income stream for the Local Authority – this can be used for projects and infrastructure that will ultimately benefit society.
- Continued employment across a range of sectors including construction, planning, design, environment, grid and operational phase maintenance.
- Sustainability – working towards a sustainable and balanced economy and way of life going forward that benefits from reduced fossil fuel generation.
- Improving the reliability of energy supply into the future with reliance on locally generated renewable energy while replacing fossil fuel dependency.
- Reduced carbon emissions and improved air quality.
- Ongoing upgrades to our national grid infrastructure to facilitate renewable energy generation.
- Companies are seeking to use renewable energy for their business and will seek out opportunities or locations where there is a strong grid infrastructure and availability of reliable renewable generation.

- Demand for power is increasing and in areas such as the development of data centres where significant load is required. This taken in the context of Moneypoint Powerstation moving away from coal as a fuel source and the regional energy generator identifies the need for increased generation in the region.
- There is an opportunity in the West and South West of Ireland to grow based on our experience in delivery of renewable energy projects over the last 20 years and further provide jobs and employment in this niche sector. Skills and expertise which are in demand across Europe in renewable energy generation are well developed here, but can be grown more.
- The Shannon Estuary Plan has identified large areas of the county along the shores of the estuary that will be suitable for new industry and development and to also strengthen existing business and infrastructure. Energy is essential for this development going forward.

The items above are an overview and there are many indirect benefits that will not be apparent at this stage. The experience in countries like Denmark where the renewable energy sector is very well developed and moving almost completely away from fossil fuel use, is that the benefits to a county, its environment and people is very clear over time.

Clare is in a strategic location to enable the decarbonisation of the gas network through the development of biogas infrastructure in the County and the resulting grid injection of renewable gas. Gas Networks Ireland have published Vision 2050 aiming to achieve a net zero carbon gas network by 2050. Gas Networks Ireland plans to inject 50% carbon neutral or zero carbon gases into the network, with renewable gas generated through the anaerobic digestion process key to achieving this. To achieve this, significant support of anaerobic digestion facilities will be required and the associated gas network injection infrastructure.

The transition to a low carbon economy places emphasis on a move from petrol and diesel vehicles, towards EV and potentially biogas and hydrogen in the future. This transition places further emphasis and requirements on renewable energy generation to provide for these low carbon modes of transport. Bus networks, electric cars and bikes will be common place on the streets and roads of Clare during the County Development Plan 2022-2028, placing additional pressures on the electricity transmission and distribution systems, and the requirement for charging points for electric vehicles, and filling stations for biogas/hydrogen powered vehicles. This transition requires additional installation of renewable energy developments including wind, solar and biogas. The support of further renewable energy developments will lead to the establishment of a support system for biogas powered vehicles including buses etc, giving opportunities to develop biogas infrastructure in Clare County. Gas Networks Ireland have published Vision 2050 aiming to achieve a net zero carbon gas network by 2050. Gas Networks Ireland plans to inject 50% carbon neutral or zero carbon gases into the network, with renewable gas generated through the anaerobic digestion process key to achieving this. To achieve this, significant support of anaerobic digestion facilities will be required and the associated gas network injection infrastructure, giving Clare County a significant opportunity to support the development of anaerobic digestion facilities to ensure renewable gas targets are achieved.

Over the course of the Clare County Development Plan 2022-2028, it is planned that the Moneypoint electricity generation station will cease using coal as a source of fuel, leaving a potential gap of 915MW of generating capacity in the mid-west/Shannon estuary region. Without significant investment and support of renewable energy projects in the region, energy security is a major concern. This closure, coupled with the renewables requirements and the transition to

electric vehicles will place significant strain on the electricity network and places further emphasis on the required support of renewable energy projects and associated grid connections in the region and specifically in the Clare County Development Plan 2022-2028. The development of large scale electricity users such as data centres which can have a requirement of in excess of 20MW, will place further constraints on the electricity network. The co-development of industries such as data centres and renewable energy projects will be required.

In Ireland, we are in the process of change and transition and this journey which will have many twists and turns. What is certain is that a robust Clare County Development Plan with an integrated approach on renewable energy and climate change is essential to bridging the implementation gap.

8 DEVELOPMENT PLAN OBJECTIVES AND POLICIES – PROPOSED ENHANCEMENTS

In preparing this submission the following were completed:

- Review of the County County Development Plan 2022 – 2028 Strategic Issues Paper
- Review of the Clare Renewable Energy Strategy 2017
- Desk based constraints analysis
- Mapping of grid infrastructure
- Identification of potential areas that are suitable to provide additional renewable energy generation

In preparation of the Clare County Development Plan 2022-2028, Greensource recommend the following:

- Continuation of regional approach towards wind energy zoning taking changes to neighbouring county zoning patterns into account.
- Continuation of exclusion of wind speeds as a criterion for developing and zoning areas for renewable energy development.
- Exclusion of grid constraints as a criterion for developing wind energy zoning.
- Clare County Council should adhere to the National Wind Energy Planning Guidelines which sets out recommendations in terms of siting and conditions at which wind farms should adhere to.
- Clare County Council should not recommend minimum setbacks for projects from homes or properties but instead, as mentioned, follow the national guidelines.
- The new Clare County Development Plan should recognise that if a condition limiting the operating period of a wind farm should be applied to a planning permission then that limit should be no less than 35 years.
- Support for projects which may enter the repowering stage during the lifetime of the development plan.
- Support of alternative renewable energy technologies including biogas, battery storage, hydrogen or other technologies which may become available over the duration of the development plan.

We note from the Issues Paper that at this stage the focus is in identifying the "big ticket" or fundamental items. Consequently, we have focused on what aspects could fundamentally change that would give a step change in the potential to generate significantly more renewable energy in the county.

9 CONCLUDING STATEMENT

Greensource is one of the leading innovative energy companies in the South West of Ireland and has a clear focus on being one of the drivers for change in the transition to a low carbon economy. In order for that to occur, companies like Greensource need clear pathways through planning and development as the typical timeline from identifying a potential site to the day it is energised can be between 3 and 8 years subject to factors like Judicial Review proceedings. In that regard the County Development Plan becomes a key instrument for industry to follow and be guided by as we move forward in time.

Greensource have completed a strategic level analysis based on a constraints approach and have identified areas of land that subject to change in zoning or change in type of zoning can afford new renewable energy generation capacity for the county, while supporting the positive zoning areas already in place.

Greensource look forward to engaging with the forward planning unit in Clare County Council over the coming months and will bring their knowledge and expertise to the discussion where appropriate.