

Submission no: 171

From: Drumquin Info [REDACTED]
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To: forwardplan
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Attachments: 20 11 11_ Clare Co Co_Draft Submission_Padraig Howard.docx

Dear Director of service,

Please find attached submission on behalf of Padraig Howard .

Kind regards,

Padraig Howard BSc (SURV) Dip ConEcono



Renewable Energy

Clare County Council is a leading and proactive Local authority that has recognised the climate change adaptation challenge for the last 10 years. The imperative to reinforce the policy documents that support large scale and immediate transition to low carbon technologies and low carbon generation of electricity is profound and a challenge from which Clare Co County should not shy away. Clare is today a national leader in Renewable Energy but must stay the course to facilitate the transition to a Low carbon society.

Clare has since the foundation of the Irish state being a hub and leader in electricity generation. Since Ardnacrusha in the 1927 through to Moneypoint in the 1980's to the current situation where 230MW of wind generation of wind is built and operational, Clare has shown an ability to recognise that vital importance of Energy to sustaining life and developing modern progressive society.

The development of the Clare Wind Strategy (WES) in 2009-2010 and subsequently the Clare Renewable Energy Strategy (RES) in 2016-2017 have been the two most productive policy documents ever formulated and introduced by Clare Co Council. These two policies have delivered investment to date of €450 Million in built operational Renewable Energy developments that have shown that Large Scale Renewable Energy Developments can be delivered in a sustainable way in County Clare even in modern day context of EU legislation. The policies have been tested by An Bord Pleanala and the Judicial review process and remain intact as sustainable policy documents of National and international importance.

In addition to the projects developed to date the policies have guided applications to be brought forward and there is currently another €450m of projects in the planning stage in Clare. The contribution to the commercial rates base in county Clare by Energy facilities currently stands as C €15 million euro with currently circa €2million attributable to Renewable facilities. The full realisation of the RES in the 2017-2023 plan would see this contribution for renewable rise from €2M in 2020 to in excess of €10m by 2025.

The stated targets in the WES OF 550MW of on shore wind needs to be, at a minimum, restated in any review of the strategy and also the stated target of 950mw in the RES needs to be, at a minimum restated and consideration given to increased targets in areas previously screened out such as the Aughty mountains. The SPA designation objectives of the slieve aughties may well now be outdated and the latest science around the interaction of the Hen harrier populations with farms has progressed on a lot and it can be seen in other SPA area that windfarms and Hen harrier conservation can be successfully achieved as can be seen in the Ballyoura SPA in limerick.

Further consideration should be given to onsite generation in industrial and commercial and residential developments. Roof spaces for Solar and ground mounted solar areas in green areas and carefully selected open space should be considered and an objective included to allow this.

The attraction of large scale employment on the back of the achievements on the Renewable energy developments is an area of particular disappointment to this author despite previous submissions to the plan reviews encouraging this. The recent variation to the Ennis development plan is very welcome to allow Cloud computing and data storage be developed in Ennis with the associated employment opportunities. The successful development of this type of development will require Low Carbon energy generation facilities and the fulfilment of the WES and the RES. The towns of Kilrush, Mitown Malbay, Ennis and Shannon should all have sites identified where cloud computing and data storage could be located in close proximity to RE power generation facilities.

An objective should be included in the new development plan WES and RES to support on site renewable generation of Solar and Wind to assist in powering new commercial, industrial and residential developments. An example of this is clearly seen in University of Limerick with the provision of an onsite Wind Turbine. This sends a clear statement to potential users of the importance that Clare as a County places in low carbon technologies and realising the stated objectives of achieving the transition to a low carbon economy.

RES needs to promote the production of bio mass and bio gas in tandem with agriculture in the county.

Demonstrator sites should be considered and could be co-located with existing windfarm or solar sites.

The active encouragement of the conversion of Money point to a bio gas and or hydrogen production site should be promoted and encouraged with alternative sites identified if ESB are not able or willing to consider this as a viable future for the facility. The Just transition funding available from government could support the transitioning of money point from Coal to bio gas.

Furthermore money point could and should be prioritised as a Clean coal facility hereby the carbon emitted is captured and successfully stored, this is a new and emerging technology that could allow money point sit as a strategic facility in terms of security of supply, whilst not adding carbon to the atmosphere through carbon capture and storage.

The Challenge of our Generation - Climate Action Plan 2019 and Renewable Energy Targets

On 17th 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%).

Other sectors namely Transport, the Built Environment, Agriculture and Industry are also tasked with significant CO2 emission reductions but of a comparatively lower order namely 37.5%, 31.25%, 7.5% and 6.25%

respectively. This makes transforming the electricity sector the single greatest lever in the CAP in terms of

CO2 reduction (Ref. EirGrid Strategy Launch 2019, CEO presentation).

The 2019 CAP provides a roadmap of what must be achieved and requires 70% of all our electricity to come from renewable energy sources by 2030. This almost doubles our current target of 40% by 2020. To achieve the 70% target, the CAP earmarks a target of 3.5GW off-shore wind and a doubling of existing on-shore wind from circa 4GW (today) to 8.2GW by 2030. We request that this target and any update thereof is specifically referenced in the new County Development Plan. It is important that this reliable and established source of renewable energy continues to be recognised, promoted and facilitated in the new Plan.

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. County Clare could get leap frogged in terms of its strategic importance if the RES and WES do not show intent, conviction and ambition.

The 2020 programme for government further 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 achieving net zero emissions by 2050. The 2050 target will be set in law by the Climate Action Bill, the draft text of which was published on 7th Oct. 2020. This also proposes a strengthened role for the Climate Change Advisory Council, an annually revised Climate Action Plan and new oversight and accountability by the Oireachtas. Every sector must contribute to meeting the 2050 target by implementing policy changes as outlined throughout the programme for government.

This author believes that planners have the unique skills and experience to establish a clear and consistent plan-led approach to the delivery of this considerable quantum of renewables. Planners have a responsibility to ensure an appropriate, plan-led framework is in place to provide certainty and predictability to the market and to ensure the appropriate balance between all land use constraints and opportunities, and community and other interests.

In terms of certainty to the market it should also be noted that changes to various Government renewable energy policies in recent years has put planning permission as the critical first stage of all renewable energy projects. Only when planning permission is secured can a project apply for a grid connection to export energy to the national electricity grid (which may require a separate planning consent) and then seek to identify a route to market to sell the energy that will be generated. This can be an overall lengthy and sequential process that needs to be underpinned by a robust plan-led framework to ensure time and resources are correctly focussed if we are to achieve national targets.

Southern Regional Spatial and Economic Strategy & a Regional Approach to Renewable Energy Strategies

The Southern Regional Spatial and Economic Strategy (RSES) also clearly recognises the urgent need to transition to renewable energy. Policy RPO 98 and RPO 99 of the RSES state:

“RPO 98: It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders.

RPO 99: 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.”

This Author strongly supports the development of a Regional Renewable Energy Strategy to complement the local authority approach; which would co-ordinate the identification of sites of scale and ensure inter county consistency in relation to designating renewable energy zones and identifying landscape sensitivities.

This author is very familiar with Clare’s current Wind Energy Strategy and Renewable Energy Strategy which was adopted into the current County Development Plan 2017-2023 and recognises the high quality of those document. However, given the new context in the Climate Action Plan and Programme for Government we suggest the WES and RES will require updating and should form part of a wider RES for the county. The proposed new Wind Energy Guidelines will impose further constraints on Strategic sites as identified in the current WES in terms of set backs from residential houses.

Current technological trends are towards larger turbines 150m-200m from ground to tip height this will mean that setbacks as proposed in the guidelines at 4 times tip height will see set backs increase from the current 500m to between 600m-800m. however the rated capacity is also increasing in line with the increased size, with capacities moving towards 5mw per turbine currently and the predictions are for 10-15mw per turbine by 2025 at 150-200m height. This will mean that along the spatial extents on sites will shrink the energy yield can be maintained. To this end we would encourage the council to resist the dezoning of strategic sites currently in the WES. Furthermore new sites can now be considered once the 600-800m setback can be achieved.

The Draft Wind Energy Development Guidelines 2019 were also published last December by the Department of Housing, Planning and Local Government. These are likely to be finalised later this year. Specific Planning Policy Requirement (SPPR) 1 requires compliance with Section 3.4 which in turn says the Development Plan should set out the following: “the identification on development plan maps of the key areas within the planning authority’s functions area where there is significant wind energy potential and where.... Wind energy developments will be acceptable in principle... open to consideration... generally discouraged.” As SPPR1 is proposed to be a binding requirement of the Wind Energy Development Guidelines, it essentially requires the preparation of a Wind Energy Strategy. There is a need to review the current strategy to meet new national targets and an

obvious opportunity to incorporate this as part of the new County Development Plan review process.

We recognise the scale of national ambition has increased significantly in the last 12 months and will continue to do so. This places further importance on the need for the new Clare Development Plan to restate and update its best in class RES and to bring forward more progressive policies and objectives that ensure the County continues to fulfil its renewable potential, and to contribute proportionately towards national on-shore and off shore wind targets.

The operational life of windfarms is increasing towards 35 years+ and this should be supported in the WES and RES.

