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IWEA Submission on Draft stage of Offaly County Development Plan 2021-2027

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1 Introduction

1.1 Outline of Submission

IWEA welcomes the opportunity to make this submission at the draft stage of the review of the Offaly County Development Plan.

We have reviewed the draft plan and associated documents and wish to make specific comment on the following:

Chapter 3: Climate Action and Energy

Chapter 4: Biodiversity and Landscape

Chapter 5: Economic Development

Chapter 13: Development Management Standards

County Wind Energy Strategy

Our submissions and observations are presented below.

1.2 IWEA and Wind Energy in Ireland

The Irish Wind Energy Association (IWEA) 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 member companies who have come together to plan, build, operate and support the development of the country's chief renewable energy resource.

Ireland's 2020 energy target of 40% renewable electricity was a key driver in the development of wind power over the last decade. 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.

Wind energy currently provides almost 33 per cent of Ireland's electricity, which 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[1]. In 2018 wind energy avoided 3.1 million tonnes of CO_2 and cut €432 million off our fuel import bill[2] 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 4,100 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 is relatively low by other EU standards.

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.

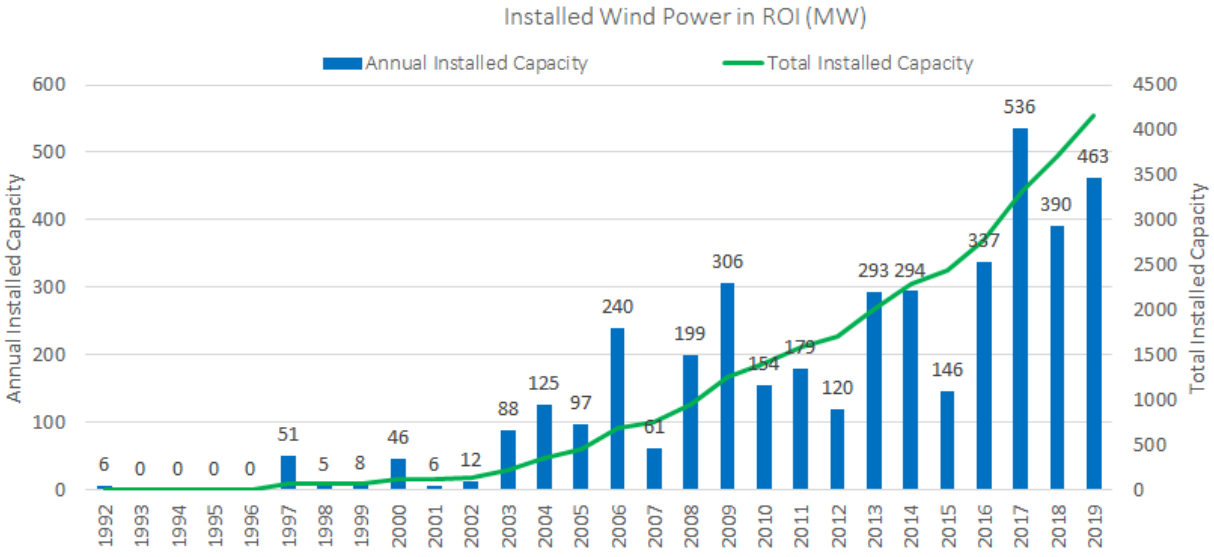

Figure 1: Installed capacity of onshore wind in Ireland since 1992.

[1] https://www.linkedin.com/pulse/wind-generation-ireland-2019-martin-howley/
[2] https://www.seai.ie/publications/Energy-in-Ireland-2019-.pdf

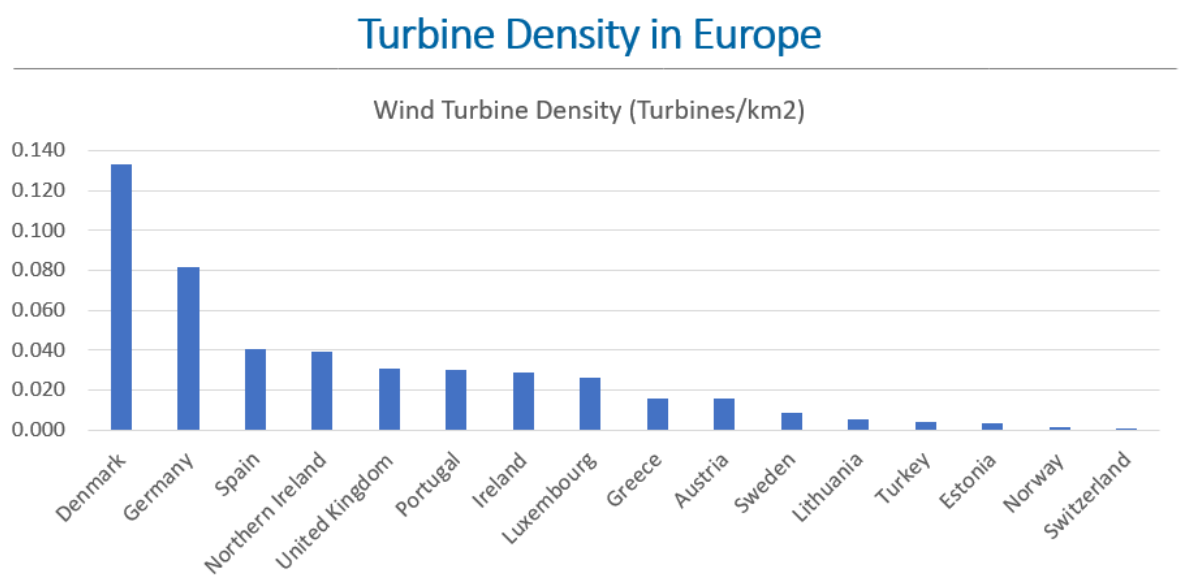

Figure 2: Turbine density in various European countries.

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. That is why it is critical that the new Offaly WES provides every opportunity to get as many of the projects currently in development through the planning and approvals system to enable them to contribute to hitting our 2030 targets.

1.3 Wind Energy Is Popular

The most recent opinion poll carried out for IWEA by Interactions found that 79 per cent of Irish people were strongly in favour of, or tended to favour, wind energy (Figure 3). It is important to reiterate that these figures have been replicated over the years and with different polling companies. An Ipsos MRBI poll from February 2016 found support for wind energy at 70 per cent and polls from the same company in 2014 and 2013 found that opposition to wind energy only once, in 2014, reached double figures at 12 per cent. A 2016 opinion poll carried out by Research Now for the ESRI put support for wind energy at 78 per cent positive versus 10 per cent negative making it more popular than gas, coal and biomass[3] (Figure). The Irish people support clean, renewable, indigenous energy.

[3] ESRI Working Paper 545. October 2016.

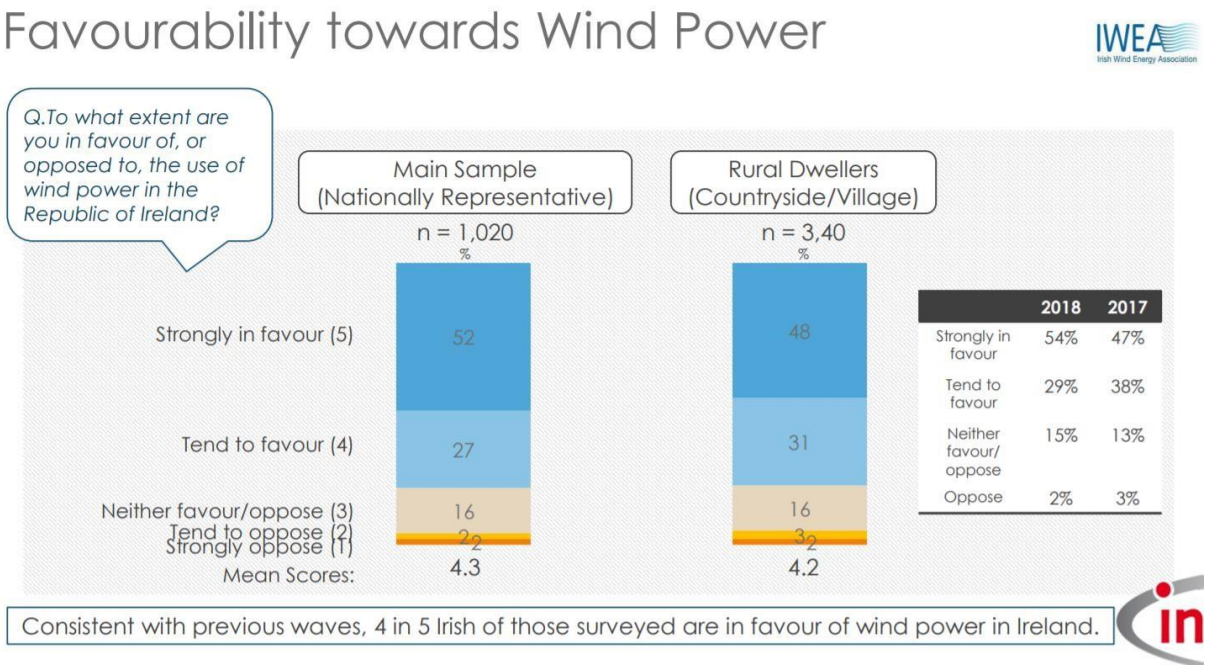

Figure 3: Results from opinion poll carried out by 'interactions' on the attitude of Irish people towards wind energy[4].

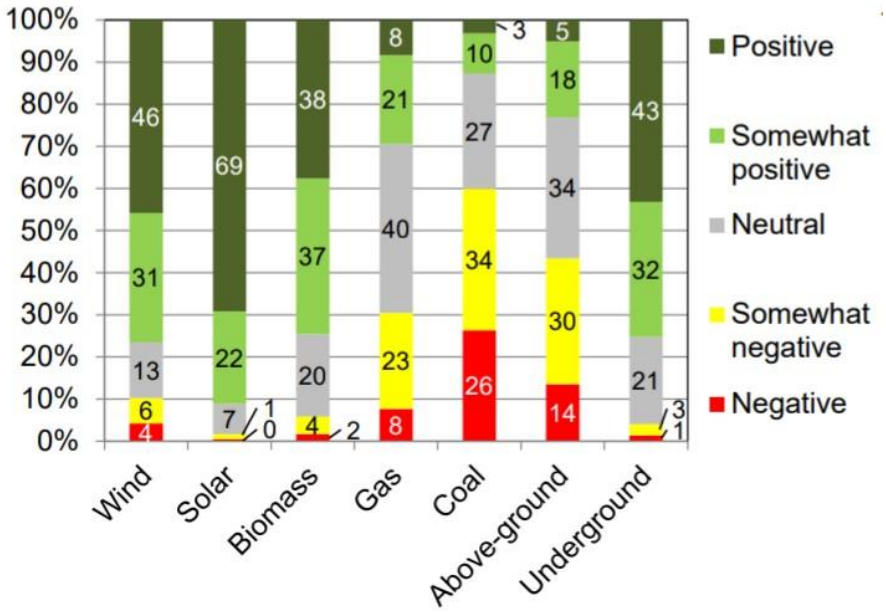

Figure 4: Irish Residents Views of Energy-Related Technologies (Bertsch et al., ESRI, Journal of Energy Policy 2017[5])

IWEA believes it is important to consider the views of those living near wind farms, but also of wider Irish society when identifying the priorities for the WES for County Offaly.

[4] https://iwea.com/latest-news/2948-new-poll-confirms-overwhelming-majority-back-wind-energy
[5] http://dx.doi.org/10.1016/j.enpol.2017.04.008

2 Chapter 3: Climate Action and Energy

Our submissions or observations are generally supportive of the provisions of the Chapter.

3.1.6 Local Level (County Offaly)

The long history of energy production and diversification of energy production towards green energy such as wind is welcomed. We support the recognition of the potential economic benefit of a transition from fossil fuel based energy through to investment in renewable energy.

3.2.6 Wind Energy

The commentary is noted and the inclusion of a County Wind Energy Strategy as part of the County Development Plan is welcomed.

3.4 Electricity Transmission and Distribution

The strong electricity network traversing County Offaly is noted in the document. This is an advantage that County Offaly has over most other counties. We submit that this be considered as a potential opportunity to develop an ambitious renewable energy target for the county.

3.13 Decarbonisation Actions and Projects

We welcome and support the extensive list of actions and projects including "Renewable and low carbon energy, for example, wind, solar, bioenergy, district heating".

3.14 Climate Action and Energy Policies

We are generally in support of the policies and in particular CAEP-01, CAEP-03, CAEP-04, CAEP-05, CAEP-06, CAEP-07, CAEP-08, CAEP-15, CAEP-20, CAEP-22, CAEP-23, CAEP-24, CAEP-25, CAEP-26, CAEP-34 and CAEP-37.

We wish to comment on specific policies as follows:

CAEP-02: It is not clear as to whether or not this refers to distribution connections within urban development only or if it could be construed to include grid connections and electricity distribution systems. We contend that while, in general, grid connections to wind farms are underground, there may be circumstances where sections of overhead line may be appropriate.

CAEP-35:

(c) The basis for such a proposal does not appear to be evidenced based and would be contrary to national and regional policies. This also includes other supporting policies in the Draft CDP.

The Draft Wind Energy Development Guidelines (WEGs) 2019 state it is a specific planning policy requirement under Section 28(1C) of the Planning and Development Act 2000, as amended, that, in both their development planning and management functions planning authorities shall not apply a setback distance that exceeds 4 times tip height of the relevant wind turbine and the nearest point of the curtilage of any residential property in the vicinity, subject to a mandatory minimum of 500 metres.). The proposed town and village setback has the potential to conflict with the WEGs and any subsequent update.

We suggest this ref. is removed from Standard 109 and from CAEP-35, and that all associated policies rely on and refer to setbacks in the DHPLG WEGs 2006 and any future amendment. This will ensure that the Council does not build conflicting policies into its Plan and in particular a conflict between CAEP35(a) and (c). (Note CAEP 35(a) says the Council will uphold the WEGs)

(d) Please see separate commentary on Development Management Standards in Section 5 of this Submission.

CAEP-36: In the case of repowering projects, it is unlikely that new turbines would be available to match those of the original windfarm. Replacement with larger turbines, spaced further apart, is a likely scenario. In that case, there would not be an increase in the number of turbines if confined to the original footprint.

Renewal Projects

Renewal Projects have not been addressed in the draft County Development Plan. Section 7.2 of the Climate Action Plan 2019 has a target of 70% renewable electricity by 2030. So as to assist in meeting this target, it is important that renewal projects having a specified time limit for operation as a Condition of Planning Permission be afforded every opportunity to maintain their contributions rather than cease production.

We recommend that a policy dealing with Renewal Projects be included.

3.15 Climate Action and Energy Objectives

Sub-item 3, we suggest that 'Renewal Projects' also be included.

3 Chapter 4: Biodiversity and Landscape

4.13 Areas of High Amenity

We note the extensive considerations in relation to the designation of Areas of High Amenity as illustrated in Figure 4.18. We recommend that shape files be made available to the public for accurate evaluations of the boundaries of the designated areas.

4.14 Landscape

We note the designation of the Landscape Classification Areas in County Offaly as illustrated in Figure 4.22. We recommend that shape files be made available to the public for accurate evaluations of the boundaries of the designated areas. We also note the various sensitivity areas as well as the Key Scenic Views and Prospects in Offaly. We note that these fed into the Wind Energy Strategy.

4 Chapter 5: Economic Development

5.6.6 Energy

We welcome the statement that the "Council" will encourage and facilitate the development of renewable energy projects in rural areas. Ongoing investment and economic development benefits during the 30+ year operational lifespan of wind farms, take the form of rents payable to landowners, financial support for local communities in the form community benefit schemes and commercial rates payable to Local Authorities. Under the Renewable Energy Support Scheme (RESS), the Community Benefit is prescribed at €2/MWh generated. Combined, these amount to approximately €25,000 per MW per annum. As set out in Table 1 and Table 2 of the draft County Wind Energy Strategy, the combined generating capacity of existing and permitted capacity is 336MW.

If the next Offaly County Development Plan were to lay the right policy foundations for a further 350MW of wind energy development in the County over the next decade, that would result in an annual investment of over €8.75 million in the Offaly economy, or €252.5 million over a typical 30-year operational lifespan of projects. As much of this would be spent within communities, it would contribute to the economic well-being of towns and villages.

We note REDP-14 in relation to the development of renewable energy in rural areas where it is considered appropriate.

We note RDO-05 and welcome the possible use of industrial peatland sites for climate change mitigation including renewable energy.

5 Chapter 13: Development Management Standards

We refer to Section 13.9.13, DMS-109 Wind Farms.

First paragraph, third bullet – we have made comment on same under item (c) of CAEP-35.

Second paragraph, the last bullet references the World Health Organisation's (WHO) 2018 Environmental Noise Guidelines for the European Region. This is a very complex document that has different noise metrics than those currently in use. There has been much debate and extensive submissions made in relation to noise aspects as part of the Public Consultation on Draft WEGs, 2019. It is anticipated that these Guidelines will be finalised late this year. We respectfully suggest that noise limits be covered under the new WEGs for Planning Authorities and that the reference to the WHO Guidelines could create ambiguity and should be deleted.

6 County Offaly's Wind Energy Strategy

6.1 Approach

Offaly County Council is to be commended for preparing its wind energy strategy in 2014, which provided a plan-led, supportive policy framework for the wind energy industry to bring forward planning applications for developments of appropriate scales in appropriate locations. From the wind energy industry's perspective, that 2014 Wind Energy Strategy was a very useful document, which stood the test of time as it was incorporated into the County Development Plan 2014-2020, and enabled a pipeline of future wind farm projects (set out in Table 2 of the current Draft Stage County Wind Energy Strategy), to secure planning permission and which will, hopefully be awarded grid connection contracts under the Enduring Connection Policy (ECP) process and contracts for the sale of electricity under the RESS schemes.

By now initiating the preparation of a new Wind Energy Strategy (WES) for County Offaly as part of the preparation of the Offaly County Development Plan 2021-2027, Offaly County Council is again to be commended for taking the opportunity to review its renewable energy policies at the start of a new decade, in light of quiet different Government climate change, environmental and energy policies.

Changes to various Government renewable energy policies in recent years has now put planning permission as the critical first stage of any renewable energy projects. Only when planning permission is secured can a project now apply for a grid connection to export the energy to the national electricity grid and identify a route to market to sell the power. Therefore, clear and supportive planning policies for wind and all renewable energy developments are required to ensure we meet the challenges of addressing climate change and decarbonising the Irish economy over the next decade.

With County Offaly's significant area, good wind energy resource, excellent electricity transmission infrastructure, and as county with a heritage of electricity generation, County Offaly needs a progressive and ambitious Wind Energy Strategy (WES) with clear and supportive policies in favour of further wind energy development.

IWEA welcomes the approach in relation to the proposed new WEGs (due to be finalised later this year) and that the new CDP and WES for County Offaly refers to these Guidelines and require future proposed wind energy developments in County Offaly to comply with the guidelines of the day. The Department has clearly stated on numerous occasions the 2006 guidelines remain in effect until they are replaced.

6.2 Designations

We note that the step by step process of development of the Draft County Wind Energy Strategy has yielded just two designations viz:

- Areas Open for Consideration for Wind Energy Development
- Areas Not Deemed Suitable for Wind Energy Development

This is in contrast to the general Zoning Matrix as set out in Section 12.3 of the Draft CDP which has three zonings viz:

1. Permitted in Principle
2. Open for Consideration
3. Not Normally Permitted

Does the scope of Section 12.3 of the Draft CDP cover wind energy or does it need to specifically refer to zonings for wind energy projects as outlined in the Draft County Wind Energy Strategy?

6.3 Policy Ambition

IWEA encourages Offaly County Council to take an ambitious approach in deciding the actual installed capacities of wind energy in the new WES for County Offaly. The strategy is going to aim to facilitate by way of how many MW or GW of wind energy it should make provision for in lands they deem acceptable in principle or open for consideration.

To-date, there does not appear to be any central Government or Regional Assembly guidance on how many MW or GW of new wind energy development each Local Authority like Offaly County Council will need to be making provision for. In this absence of such guidance, Offaly County Council should seize the opportunity and seek to identify enough land to accommodate as much as possible of the additional 4.2GW of additional onshore wind energy required by the Climate Action Plan by 2030.

The quantum of land identified as potentially suitable for wind energy development must go far beyond the actual amount required, to allow for a natural attrition rate across development sites and projects.

To deliver 4.2GW of new wind energy capacity on-shore by 2030 to meet the Climate Action Plan's target, will require a sufficient quantum of land to accommodate many multiples of 4.2GW to be classified as suitable for wind energy. This multiple is required to allow for the natural attrition rate

of the wind energy development process, where every site or area that has theoretical potential, cannot convert that theoretical potential into actual potential, as illustrated in the graphic opposite, taken from the SEAI Methodology for Local Authority Renewable Energy Strategies.

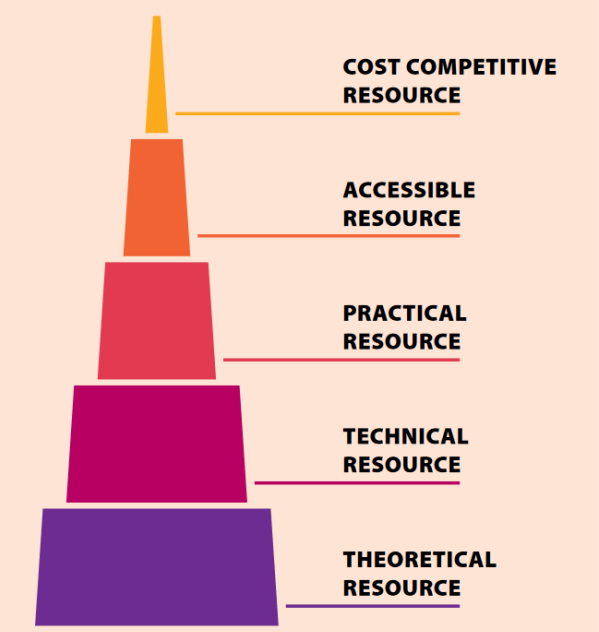

Figure 5: Geographical representation of sieve analysis approach (Methodology for Local Authority Renewable Energy Strategies, SEAI)

The theoretical resource is reduced for many reasons. Even where a site is considered suitable for a wind energy development in a WES, landowners may not be agreeable to accommodating a project on their lands. If landowners are agreeable, site-specific environmental constraints such as bird activity, peat depth/stability or a high concentration of neighbouring properties might rule a site out. If no such constraints exist, a project's planning application could still be refused permission, or if granted, overturned on judicial review. If granted permission, a project may not be able to secure an economically viable grid connection, or be able to find a route to market for its electricity that make the construction of the project a commercially viable proposition. These are just a few examples of the hurdles a project must clear to convert theoretical potential to actual, delivered capacity. To deliver 4.2GW of new onshore wind by 2030, is likely to require a quantum of land sufficient to accommodate 15-20GW of land to be identified as suitable for wind energy, if we want to see 4.2GW actually delivered and connected based on a theoretical analysis and a view from IWEA members on likely success rates.

Offaly County Council will need to classify a sufficient quantum of land as being potentially suitable for wind energy, based on what that will likely translate to in installed MW or GW capacities using the project attrition hurdles highlighted above.

IWEA strongly suggests that the CDP and WES for Offaly must classify a sufficient quantum of land as being suitable for wind energy, to ensure national renewable energy targets can be achieved, and demonstrate how the quantum of land classified as suitable is sufficient for this purpose.

A clear policy ambition in the CDP and WES for County Offaly is critical to guide the strategy and the identification of a sufficient quantum of potentially suitable land. For example, If Offaly County Council wanted to identify areas sufficient to accommodate 400MW, it should be able to do so. Equally, If

Offaly County Council wanted to identify areas sufficient to accommodate 800MW, it should also be able do so by applying slightly different criteria to the constraints or sieve mapping exercise, or how the strategy consideration of landscape capacity. IWEA contend that the level of policy ambition set by Offaly County Council should dictate the criteria used in preparing their wind energy portion of the new WES for County Offaly, rather than just "running" a standard approach and seeing what the strategy ends up with.

6.4 Methodology

IWEA would like to compliment Offaly County Council for adopting the LARES and step by step approach to the preparation of the new WES for County Offaly.

Offaly County Council will be aware of the Department of Housing, Planning and Local Government's (DHPLG) recent public consultation on the Draft Revised WEGs, and specifically Chapter 3 of the draft guidelines on planning for wind energy development through the Local Authority development plans and wind or renewable energy strategies.

In our submission to DHPLG on the Draft Revised WEGs, IWEA has already suggested that the step-by-step guide outlined in Section 3.6 Draft Revised WEGs should be strengthened to give clearer direction to planning authorities on the need to consult with neighbouring planning authorities to ensure a consistent approach across county boundaries, and that this interaction with adjoining Local Authorities be made a mandatory part of the preparation of the WES. IWEA notes that while the County Development Plans and Wind Energy Strategies of adjacent counties have been reviewed by Offaly County Council, we encourage the Council to engage with the County Councils of Galway, Kildare, Laois, Tipperary, Roscommon, Westmeath and Meath to ensure a consistent approach is taken across county boundaries as each Local Authority moves to prepare or review its WES.

When finalising the new WES for Offaly, IWEA urges Offaly County Council **not** to consider the following potential constraints or facilitators in the process of identifying areas as being potentially suitable for wind energy developments:

1. **Grid Capacity -** Existing or planned electricity grid capacity should not be considered a constraint for the purposes of determining whether areas of County Offaly are suitable or unsuitable for wind energy development. 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. However, given the extent of grid

within the Count, lack of grid capacity is not seen as a major constraint.

2. **Wind Speed -** Wind speed should not be used as a constraint for site suitability or unsuitability at the strategy preparation stage, as wind turbine technology is quickly evolving to be able to harness lower wind speeds than was not thought possible only a few years ago. The SEAI Wind Atlas of Ireland is also derived from a computer model and would not be as accurate as on-site wind measurements which are used by wind energy developers to verify a site's wind regime as being viable. Therefore, for these two reasons, to exclude areas solely on the basis of wind speeds derived from a national wind atlas would be an overly conservative approach and would unnecessarily prevent a suitable classification being applied to what otherwise could be a perfectly viable site. Reference to the draft WES suggests that the areas of the western extremity has been excluded based on wind sped but that visual impact comes into play in this one also.
3. **Nature Conservation Areas -** Areas designated for nature conservation should also not be automatically excluded from accommodating new or repowered wind energy projects. This is because, for example, in such constraints-led studies, Special Protection Areas (SPAs) would typically be deemed unsuitable. However, there is greater than 1GW (1,000MW) of wind energy developments currently in operation in SPAs within Ireland.

6.5 Landscape Capacity and Landscape Sensitivity

The current Offaly Wind Energy Strategy and other counties' Development Plans and Renewable or Wind Energy Strategies providing locational guidance for the siting of wind farms, have traditionally directed them towards landscapes of lower sensitivity. These lower sensitivity landscapes would generally be considered to have a higher capacity to accommodate wind energy developments, or in fact any type of development. As illustrated in Figure 6 below, the least sensitive landscapes would generally be considered to have the most capacity to accommodate development, while the most sensitive landscapes would generally be considered to have the least capacity to accommodate development.

As decarbonisation and renewable energy ambitions increase, wind energy developments will have to extend from the least sensitive landscape areas with the most capacity, into areas of slightly more sensitive landscape.

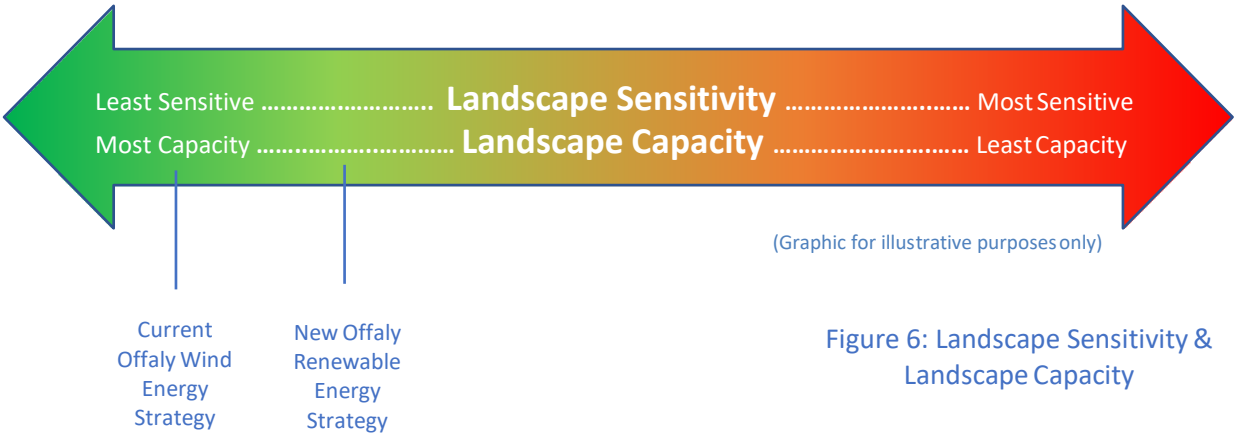

Figure 6: Landscape Sensitivity & Landscape Capacity

The Government's Climate Action Plan will require a further 4.2GW of wind energy to be installed onshore by 2030. This additional 4.2GW will have to be located in areas of slightly greater landscape sensitivity than the 4GW already installed. However, there remains significant landscape capacity across the country and across County Offaly to fulfil the State's onshore wind energy and renewable energy ambitions. The most scenic parts of County Offaly should can still be protected and deemed not normally permissible for wind energy in the new WES for Offaly, but it will still be necessary to extend the areas that will be considered suitable for wind farm development into slightly more sensitive landscape areas if we are deliver on the requirements of the Government Climate Action Plan over the coming decade.

6.6 Extent of Land Designated in Draft WES

We note the extent of lands designated in the draft WES. As per the current (2014) WES, there are two areas zoned as being areas open for consideration to Wind Energy Development, one in the east of the County and the other in the north-west.

We note that the outline of lands designated in the east of the County is similar to that of the current (2014) WES apart from two localised areas, one at the north (NHA) and one at the south (low wind speed) of the zoned area.

The outline lands designated in the north-west is generally at the same location but is more irregular in form suggesting more rigorous analysis than the current Wind Energy Strategy. However, the more irregular landholding will result in less efficient layout for wind farms.

6.7 Regional Approach

IWEA acknowledges that Offaly County Council is only responsible for its own functional area and that the new CDP and WES for Offaly will only extend as far as the Offaly County boundary. IWEA acknowledge that in Chapter 9 of the draft WES, Offaly County Council has assessed the County Development Plans and Wind Energy Strategies of adjoining counties. It is noted that, apart from County Laois, there is a high consistency across the CDP's and WES's of the other counties.

IWEA 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. IWEA 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 IWEA 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. IWEA 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.

With this regional approach in mind, IWEA engaged proactively in the public consultation processes run throughout 2018 and 2019 on the Regional Spatial and Economic Strategies (RSESs) resulting in the following policy objectives being incorporated into the adopted RSES documents.

The Eastern & Midland Regional Assembly's RSES adopted on 28th June 2019 includes the following objective:

> *"RPO 7.35: EMRA shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones.*

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 Communications, Climate Action and the Environment (DCCAE), IWEA 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.