WIND ENERGY IRELAND

Submission on Draft South Dublin County Development Plan 2022 - 2028

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1 Introduction

1.1 Outline of Submission

Wind Energy Ireland (formerly the Irish Wind Energy Association) welcomes the opportunity to make this submission of the Draft South Dublin County Development Plan 2022 – 2028.

Wind Energy Ireland (WEI) have reviewed the Draft Plan. We wish to make specific comment on the following sections:

- Chapter 1: Introduction (Strategic Objectives)
- Chapter 10: Energy
- Appendix 9: Draft Landscape Character Assessment (LCA)

Our submissions and observations are presented below.

1.2 WEI and Wind Energy in 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 170 member companies 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 into the national 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 energy import bill and drives down wholesale electricity prices. To achieve this, Ireland has built just over 300 onshore wind farms, mostly since 2003, with a combined capacity of approximately 4,300 megawatts (MW) (see Fig. 1 for historical growth of wind) 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. Due to a delay between the end of the REFIT scheme and start of the RESS scheme, 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.

[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

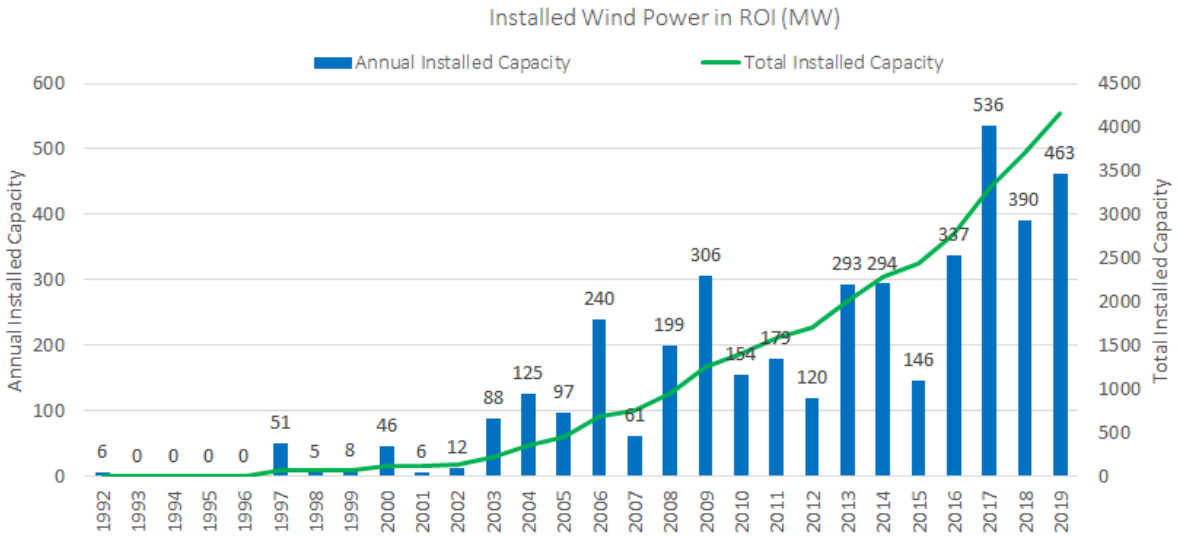


Figure 2: Turbine density in various European Countries

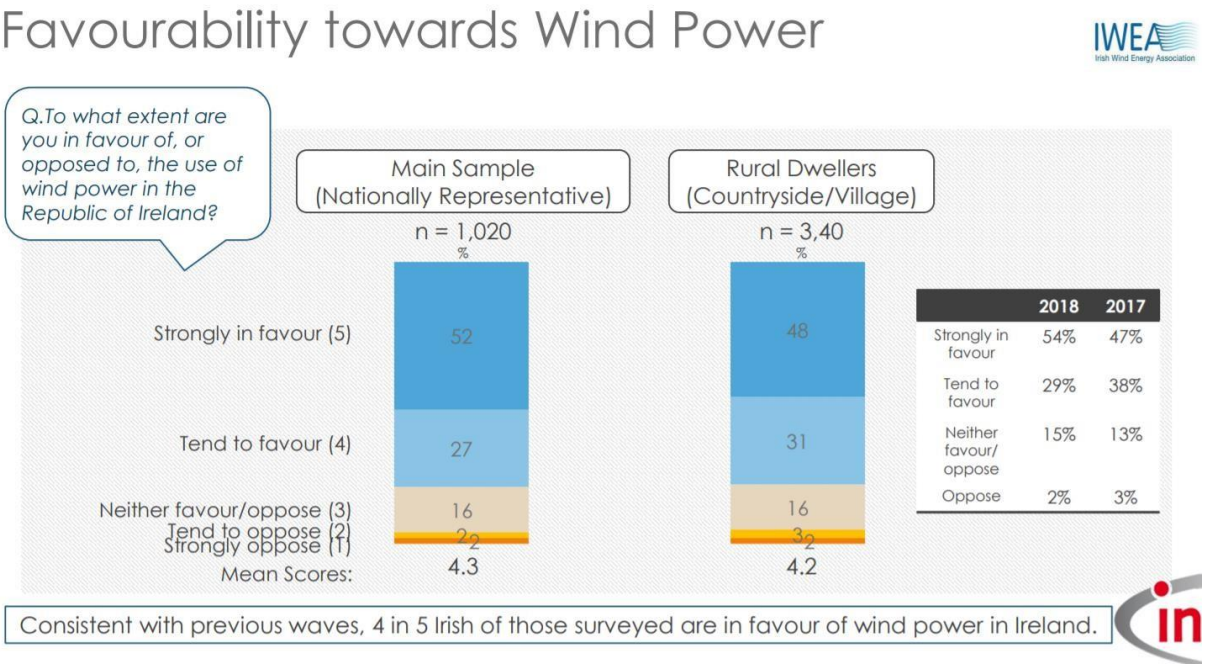
Onshore wind needs to continue growing in Ireland to meet future renewable energy targets with Ireland's Climate Action Plan proposing an increase from ~4200 MW at the end of 2020 to ~8200MW by 2030.

Offshore wind power now needs to propel Ireland to renewable energy heights if we are to meet future renewable energy targets within Ireland's Climate Action Plan. The Government committed to an ambition of at least 3.5 GW of offshore wind by 2030, which was increased to 5 GW in the Programme for Government (PfG) agreed in June 2020. This is on top of the onshore commitments above.

1.3 Wind Energy is Popular

The most recent opinion poll carried out for WEI 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[5] (Figure). The Irish people support clean, renewable, indigenous energy.

[5] ESRI Working Paper 545. October 2016.



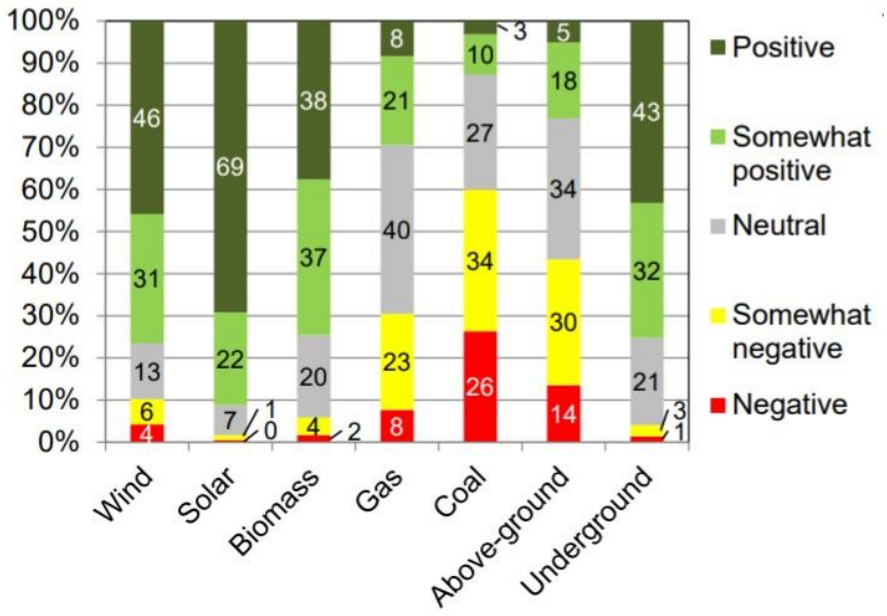


Figure 4: Irish Residents Views of Energy-Related Technologies (Bertsch et al., ESRI, Journal of Energy Policy 2017[6])

[6] http://dx.doi.org/10.1016/j.enpol.2017.04.008

2 Chapter 1: Introduction (Strategic Objections)

WEI supports South Dublin County Council's Vision:

"In 2028 South Dublin will be a place that our communities are proud of, that our businesses can thrive in and that will help us to live greener and healthier lives."

Both the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) establish the importance of addressing climate action. The National Planning Framework includes a number of National Strategic Outcomes relating to Compact Growth, Sustainable Mobility, A Strong Economy, the Sustainable Management of Water, Waste and Environmental Resources and a Transition to a Low Carbon and Climate Resilient Society. At a regional level, the Regional Spatial Economic Strategy outlines climate action as one of the three key principles underpinning the Strategy in line with national policy.

These actions and policy frameworks set out how Ireland will achieve its international and European commitments, and transition Ireland to a low-carbon, climate resilient society.

As well as the above-mentioned, WEI would also like to highlight and commend South Dublin County Council on the inclusion of Policy CA1: Climate Action:

> *To support the implementation of International and National objectives on climate action including the Climate Action and Low Carbon Development Act 2015 (and any amending legislation), the 'Climate Action Plan 2019' (and any updated Plans) and ensure that South Dublin's Climate Change Action Plan and County Development Plan are aligned.*
>
> **CA1 Objective 3**: To implement the South Dublin County Council Climate Change Action Plan 2019 - 2024 (SDCC CCAP) or superseding plans and to facilitate a just transition to a climate resilient low carbon County. (consistent with SO8 of the NPF, RPO 7.32, 7.33 of the RSES).

3 Chapter 10: Energy

WEI commends South Dublin County Council on recognising the importance of the reduction of carbon emissions. Section 10.0 states that:

> *The 'Climate Action Plan 2019 - To Tackle Climate Breakdown' represents the Government's all of society approach, aimed at enabling Ireland to meet its EU targets to reduce carbon emissions by 30 per cent between 2021 and 2030, and lays the foundations for achieving net zero carbon emissions by 2050. Within that context South Dublin County Council through its strategic County Development Plan seeks to exceed those targets or meet them earlier, creating reliable, robust and efficient energy systems which enable growth across all sectors, and which supports the future development of the County.*

The chapter notes a 34.4% improvement in energy efficiency since 2009 and outlines initiatives such as the Tallaght District Heating project. However, it was noted that energy from renewables only contributed 2 per cent to the total fuel mix in South Dublin. Of this renewable energy, 1.5 per cent came from biomass sources.

Section 10.2.7 Large Scale Wind Energy Projects states that:
The Council recognises that wind energy makes a significant contribution to reaching Ireland's renewable energy targets into the future.

A Landscape Character Assessment (LCA) updated in 2021 accompanies this Plan. A Wind Energy Sensitivity and Capacity Analysis was carried out as part of the original LCA in 2016. A Wind Capacity Sheet was completed to determine the capacity of each Landscape Character Area in the County to accommodate wind turbine developments. This analysis when combined with the Landscape Character Assessment, concluded that there are no areas in the County where large-scale commercial wind energy infrastructure could be classified as either 'permitted in principle' or 'open for consideration'.

In our previous submission to South Dublin CDP in 2020, entitled "*The Role of Wind Energy and a Regional Approach to Planning*", WEI noted that by assessing landscape sensitivity and capacity across each Regional Assembly area, it will be possible to identify lands on the lower end of the landscape sensitivity scale across each region that can accommodate the necessary GWs of new wind. WEI welcomes the inclusion of a high level LCA.

In the submission, WEI also noted that allocating a clear target of 6GW per region, requires the areas of least landscape sensitivity with the greatest landscape capacity to be identified to ensure an average of 1.4GW of new wind energy can actually be delivered in each region by 2030, which is the only way of ensuring the 4.2GW overall national target is also achieved.

Figure 10.4 presented the Wind Energy Analysis carried out. The analysis presents "Remaining Areas" where large wind energy projects may be viable. These remaining areas are limited in special extent and there is no target for new wind energy specified.

Policy E8: Wind Energy

Recognise that wind energy has significant potential to help meet renewable energy targets at a national level subject to ensuring no adverse impact on the wider environment and review the wind energy potential for South Dublin having regard to the relevant guidelines and landscape character.

E8 Objective 1: *To review the current Wind Energy Strategy for the County during the lifetime of the Plan having regard to any updated Wind Energy Guidelines and the current South Dublin Wind Energy Strategy.*

E8 Objective 2: *To continue to assess planning applications against the current wind energy strategy (2016) until such time as a review of the strategy has been completed and approved, recognising that large scale wind energy developments are contrary to the strategy.*

Section 10.2.9 Small Scale Wind Energy Projects states that:

The Council will encourage small to medium scale wind energy developments in industrial and business parks and small-scale developments for domestic purposes, in appropriate locations to serve on-site energy use (auto-consumption) and feedback of surplus to the grid. The Council recognises advances in technologies in this area and the potential for such development to be designed to suitably integrate with the built fabric of these areas. There has been Government support for this since 2007, as set out in the various planning exemptions provided for under the Planning and Development Regulations 2007 and 2008.

Policy E9: Small to Medium Scale Wind Energy Schemes: *Encourage small to medium scale wind energy developments within industrial or business parks and support small community-based proposals in urban areas provided they do not negatively impact upon the environmental quality, and visual or residential amenities of the area.*

4 Appendix 9 Draft Landscape Character Assessment (LCA)

As noted above, WEI welcomes the inclusion of a Landscape Character Assessment within the CDP and in particular Section 7 of the LCA report which refers to Landscape Capacity and Wind Energy Development.

The assessment refers to the Wind Energy Guidelines 2006 which states that 'factors that can inform landscape sensitivity to wind energy development include scenic quality, rarity, uniqueness and natural and cultural heritage considerations.'

WEI welcomes the statement in Section 7.3 Conclusion on micro or domestic scale turbine developments:

> *"There is likely to be much greater scope for micro or domestic scale turbine developments that can integrate within existing business or industrial parks that already have an established urban use and modern character. Additionally, where domestic turbines can be used in the context of farm buildings, again at domestic scale, this is considered to be the most appropriate."*

WEI notes that historic 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 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.

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 if we are to deliver on the requirements of the CAP over the coming decade.

4.1 Offshore Renewable Energy

WEI notes that draft plan made no mention of offshore renewable energy. To decarbonise we must develop offshore wind energy in large volumes and as quickly as possible. The original Climate Action Plan set a target for 3.5 GW of offshore wind – roughly 5-7 wind farms – by 2030 with the Programme for Government setting out an enhanced target of 5 GW.

Delivering offshore wind will drastically cut our CO_2 emissions. It will make Ireland more energy independent. It will attract several billion euro in investment into Ireland and create thousands of long-term and sustainable jobs, particularly in our coastal communities.

Many offshore wind projects are already engaging with local communities along Ireland's east coasts. The response so far has generally been positive with communities welcoming the enormous economic benefit and the opportunity to contribute to decarbonising our energy supply.

The offshore energy resource off the coast of Dublin has the potential to offer a considerable source of renewable energy. WEI believe projects along the East Coast will be needed to reach this ambitious target. Conditions in the Irish Sea are suitable for fixed bottom offshore wind. While conditions in the Celtic Sea are conducive to both fixed bottom and floating offshore wind according to the Offshore Renewable Energy Development Plan[1].

The sustainable development of offshore wind can provide significant socio-economic opportunities for coastal communities like those in Dublin. We would encourage South Dublin County Council to note this in the County Development Plan. The transformative impact of offshore wind is evident in the experience of our nearest neighbour. The UK's offshore renewable industry is fuelling vital investment in the domestic supply chain, building vibrant economies and supporting thousands of skilled jobs. In Great Britain it has been estimated that every 1GW of offshore wind capacity installed delivers an economic boost of €2bn to the economy[2]. While Ireland is a smaller and less mature market, we believe the potential benefits for Ireland's economic development are significant. According to the SEAI's Wind Energy Roadmap, onshore and offshore wind could create thousands of operation and maintenance jobs by 2040[3]. While the Carbon Trust estimate that over 2,500 direct jobs in Ireland could be created during the development of 3.5GW of offshore wind, a target which now stands at 5GW[4].

To realise these opportunities, integrated land and marine planning is essential. Alignment between national, regional and local planning policies is of critical importance to all those involved in infrastructure development.

[1] Offshore Renewable Energy Development Plan: https://www.dccae.gov.ie/documents/20140204%20DCENR%20-%20Offshore%20Renewable%20Energy%20Development%20Plan.pdf
[2] ORE Catapult (2017), 'The economic value of offshore wind': https://ore.catapult.org.uk/app/uploads/2017/12/SP-0012-TheEconomic-Value-of-Offshore-Wind-1.pdf
[3] SEAI Wind Energy Roadmap 2015: https://www.seai.ie/publications/Wind_Energy_Roadmap_2011-2050.pdf
[4] Carbon Trust: Harness our Potential: Investment and jobs in Ireland's offshore wind industry: https://prod-drupal-files.storage.googleapis.com/documents/resource/public/final-harnessing-our-potential-report-may-2020.pdf

In order to facilitate the expansion in electricity generation, particularly wind farms, the grid itself will require development and expansion. Given South Dublin's proximity to what will be the first offshore wind farms **WEI recommend the inclusion of a policy in support of the development and expansion of the electricity transmission and distribution grid and facilitate the development of landing locations for offshore generated wind energy**

5 Regional Approach

WEI acknowledges that South Dublin County Council is only responsible for its own functional area and that the new CDP for South Dublin will only extend as far as the South Dublin County boundary.

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.

- With this regional approach in mind, WEI 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 & Midlands Regional Assembly's RSES was adopted on 28th June 2019 and includes the following objective:
- *"RPO 7.35 Decarbonising the Energy Sector*
- *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), 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.

ENDS