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22nd November 2019

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RE: Development Plan Review - Submission on Longford County Development Plan 2021-2027 Issues Paper

A Chara,

The Irish Wind Energy Association ('IWEA') welcomes the opportunity to make this submission to Longford County Council (LCC) on the Longford County Development Plan (LCDP) 2021-2027 Issues Paper. This submission has been prepared pursuant to the public notice inviting observations and comments from interested parties.

LCC is now under the stewardship of the Eastern and Midland Regional Assembly (EMRA). As stated in the Issues paper, the LCDP will be set within the context of the strategic framework the Regional Spatial and Economic Strategy (RSES) for this region which came into operation on the 28th June 2019. One of the key objectives of the RSES is to support renewable energy opportunities by harnessing natural resources that will support decarbonisation, energy security, and allow the region to take advantage of the economic benefits of greener energy as outlined in the Regional Policy Objectives (RPO) of the Eastern and Midland Regional Spatial and Economic Strategy 2019 – 2031 (RPO's 7.35, 7.36 and 10.20). As stated in LCC's Issues paper, the Core Strategy of the 2021-2027 LCDP will include a commitment to respond to and be consistent with the RSES which provides a strategic vision based on three key principles one of which is "*Climate action, by enhancing the climate resilience and accelerating the transition of the Region to a low-carbon society*".

The National Climate Action Plan (CAP) 2019 has set out an ambitious 70% target for renewable energy production out to 2030. To meet this target, the amount of electricity generated from renewables will

have to be doubled on current figures. Figures 4.4 and 7.5 (see below) of the CAP illustrate Ireland's current and projected renewable electricity production requirements to meet the 70% target. Based on the CAP assumptions, on-shore wind will provide the majority of the required electricity yield out to 2030. Taking account of this, LCC and all Local Authorities should be cautious when considering the zonation of areas for renewable energy development going forward, so as not to constrain any areas which may have renewable energy potential, particularly for wind generation.

Figure 4.4 Ireland's Decarbonisation Pathway Dashboard to 2030[15]

	Technology	NDP 2030	Uptake to meet 2030 targets (Based on MACC analysis) 2025	2030
Electricity	**Total RES in Generation mix[4], %**	**55**	**52**	**70**
	• Onshore wind, %	~7	~6.5	~9.2
	• Offshore wind, %	1.6	~1.0	~3.5
	• Solar PV, %	1.6	~0.2	~0.4
Transport	**Electric Vehicles, #**	**498,000**	**181,500**	**936,000**
	• Passenger EVs, #	355,000	97,000	680,000
	• Passenger PHEVs, #	116,000	54,000	290,000
	• Electric delivery vans, #	19,000	30,000	61,000
	• Electric trucks, #	n.a	0	34,000
	• Electric buses, #	1,250	500-600	1,000-1,200
	Bioethanol blend, Volume	**E10**	**E10**	**E10**
	Biodiesel blend, Volume	**B12**	**B12**	**B12**
Built Environment	**Retrofitted homes[1], cumulative 2021-30, #**	**450,000**	**300,000**	**500,000**
	Electric heating sources, total residential, #	**370,000**	**350,000**	**600,000**
	• New buildings, #	200,000	50,000	200,000
	• Existing buildings, #	170,000	300,000	400,000
	Electric heating sources, total commercial, #	**15,000[3]**	**15,000**	**25,000**
Enterprise	**Emissions, $MtCO_2eq$**	**9**	**8**	**8**
	• Alternative fuels in cement fuel mix, %	N/A	65%	80%
	• CO2 neutral heat generation in food industry[2], %	N/A	~70%	~80%
Agriculture	**Emissions, $MtCO_2eq$**	**21**	**19**	**18**
	• Fertilisers CAN replacement, %	N/A	40%	50%
	• Trailing shoe slurry spreading, %	N/A	30%	50%
Other (e.g. waste)	**Emissions, $MtCO_2eq$**	**3.2**	**3.2**	**3.2**

Solar PV, some electrification of buses, and biofuel blending are identified in 2030 the NDP scenario but are not showing as cost-effective in MACC. Despite MACC analysis these technologies may remain in plan given other factors (e.g. exchequer cost, ease of implementation, need for public sector leadership)

1 Retrofit to B2 BER fabric equivalent
2 Includes biomass and electricity
3 Not specified in NDP, estimated based on residential ratio
4 RESS competitive auction determines the final mix

Table 7.5 Potential Metrics to Deliver Abatement in Electricity

Key Metrics	2017	2025 Based on MACC	2030 Based on NDP	2030 Based on MACC
Share of Renewable Electricity, %	~30%[22]	52%	55%	70%
Onshore Wind Capacity, GW	~3.3	6.5	N/A	8.2
Offshore Wind Capacity, GW	NA	1.0	N/A	3.5
Solar PV Capacity, GW	NA	0.2	N/A	0.4
CCGT Capacity, GW	~3.6	5.1	N/A	4.7

The office of the Planning Regulator (OPR) which was established in 2019 with the aim of enhancing the proper oversight of the planning system in Ireland has already written to Local Authorities within the EMRA advising them to maximise the output of renewable energy sources in line with national government policies on climate change. We would urge LCC to take cognisance of this guidance when developing the 2021-2027 LCDP.

IWEA strongly promotes the delivery of a regional Renewable Energy Strategy to facilitate the implementation of Regional Policy Objective (RPO's 7.35, 7.36 and 10.20) of the Mid and Eastern RSES in the short term, as a matter of high priority and urgency. Such an approach would ensure consistency across the entire region and minimise duplication of effort and resources at a local authority level.

However, in the absence of any certainty around the realisation of RPO's 10.19 to 10.23 of the Mid and Eastern RSES and in response to the advice of the OPR, the targets in the COP2019 and the key challenges and questions in the Issues paper by LCC, we believe a local renewable energy strategy is an absolute requirement as part of the CDP review.

In response to some of the key challenges and questions set out in the Issues paper by LCC, specifically in relation to Critical Infrastructure; Economic Development; Rural Development; Green Infrastructure and Climate Change and Energy, we believe that the correct spatial planning and development of a Renewable Energy Strategy for Co. Longford can support the transition to a low carbon society, as well as increase awareness of climate change while at the same time, helping to reduce its' impacts by facilitating plan led renewable energy development in the County. In addition, by developing a robust and well-informed plan, LCC will be facilitating rural based enterprises and ensuring employment in rural areas into the future.

During the lifetime of the current LCDP (2015-2021), LCC aimed to produce a Renewable Energy Strategy for the County (Policy RE1). While the CPD includes a map titled *"Areas of Windfarm Potential"*, this strategy has not been advanced. In line with the objectives of the current LCDP, we would urge LCC to develop a Renewable Energy Strategy for the County that incorporates the

methodologies outlined in the SEAI Local Authority Renewable Energy Strategy (LARES) as indicated in the current Plan, the current Wind Energy Guidelines (2006) and any future guidelines adopted.

We urge LCC to carry out a full assessment of Co. Longford for renewable energy development potential and zone accordingly to ensure that there is no planning ambiguity surrounding any un-zoned areas. In addition, we ask LCC and all Local Authorities to develop a consistent and transparent renewable energy zoning methodology for all Counties. We suggest the following standard for renewable energy zones: 'No-Go', 'Open to Consideration', and 'Preferred' Areas.

In relation to landscape, as per above, we also ask that LCC and all Local Authorities develop consistent Landscape Character Assessment (LCA) criteria and apply it across all Counties. We ask that a 'Low', 'Medium', and 'High' weighting table for landscape sensitivity types be considered for renewable energy development potential. We urge LCC to update the 2002 LCA completed for Co. Longford taking account of this recommendation, as we believe it would support developers and eliminate uncertainty surrounding areas un-suitable for renewable energy development at project inception.

Given that turbine technologies have advanced significantly in the past decade, we would recommend LCC and all Local Authorities that the SEAI Wind Atlas or any similar general wind resource data not be used as a constraint when developing and zoning areas for renewable energy development. We believe wind resource to be a developer's constraint, and a variable to be assessed as part of each individual project. As technologies have advanced, turbines have been developed which can yield the same energy from lower wind sites than their older counter parts.

We also believe that grid constraints should not be considered by Local Authorities when preparing their Renewable Energy Strategies, again we believe this to be a developer's constraint. We ask that LCC to consider this suggestion.

IWEA believe that we have outlined and detailed above, the Best Approach to be considered by LCC and all Local Authorities when drafting future Renewable Energy Strategies for their Counties. We urge LCC to consider above observations when producing the 2021-2027 LCDP.

Mise le meas.

Irish Wind Energy Association