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18th January 2021

Email: ciara.conboy@rwe.com

Ref: Submission on Draft Longford County Development Plan 2021 - 2027

To whom this may concern

RWE are pleased to have the opportunity to have our consultation response submission considered in respect of the Draft Longford County Development Plan 2021 - 2027.

RWE Renewables Ireland is operating and developing a number of renewable projects in Ireland, across a range of renewable energy technologies including onshore wind, offshore wind and battery storage. RWE is now one of the world's leading producers of renewable energy. RWE now stands as the world's second largest offshore wind developer and third largest provider of renewable electricity across Europe.

RWE have contributed to the feedback, comments and recommendations outlined in the Irish Wind Energy Association (IWEA) submission to this consultation process and fully support the submission made. RWE have reviewed the various sections of the Draft Longford County Development Plan 2021 - 2027 and associated documents and make this submission in accordance with section 11(2) of the Planning and Development Act 2000 (as amended) and focuses on strategic issues.

If you have any questions regarding our response, please do not hesitate to contact me.

We look forward to engaging in the next stages of this consultation process.

Yours faithfully,

Ciara Conboy-Fischer
Project Development Manager

*online submission bears no signature

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National Policy

The National Climate Action Plan (CAP) 2019 has set an ambitious 70% target for renewable energy production by 2030. To meet this target, the amount of electricity generated from renewables will have to double on current figures. Based on the CAP assumptions, onshore wind will provide the majority of the required electricity yield out to 2030. Taking account of this, Longford County Council and all Local Authorities should be cautious when considering the designation 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.

To generate 70% of the county's electricity from renewable energy by 2030, the Government's Climate Action Plan requires the installation of 4,000MW of new wind energy developments over the next decade. It took Ireland 20 years to install the first 4,000 MW of wind energy in Ireland.

Wind Energy in Ireland

Ireland's 2020 energy target of 40% renewable electricity was a key driver in the development of wind power over the last decade. Having missed this target, the 2020s represent a critical decade for the development of onshore wind farms if we are to meet our national target of 70% of electricity generation from renewables by 2030.

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.

In 2018 wind energy avoided 3.1 million tonnes of CO₂ and cut €432 million off our fuel import bill¹ 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 4,200 megawatts (MW) and over 2,500 wind turbines.

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 Longford County Development Plan and Renewable Energy Strategy provides every opportunity for the development of wind energy.

¹ <https://www.seai.ie/publications/Energy-in-Ireland-2019-.pdf>



At present, County Longford has no operating wind farms. RWE acknowledge the recent planning consent of Deryadd Wind Farm by An Bord Pleanála in June 2020 which will generate 96MW in the coming 2-3 years. County Longford has an important role to play in delivering a large share of the additional 4,000 MW of wind energy that will be required over the next decade.

County Longford's Renewable Energy Strategy

Considering Ireland's 2030 targets, it is critical that Longford's new County Development Plan and Renewable Energy Strategy reflects this ambition and lays down policies to facilitate their achievement.

With County Longford's significant area, good wind energy resource, excellent electricity transmission infrastructure, a progressive and ambitious Wind Energy Strategy (WES) with clear and supportive policies in favour of further wind energy development is critical.

RWE commend Longford County Council for its objective to prepare a Renewable Energy Strategy (RES) and assume this will include an updated WES. This will provide a much needed plan-led, supportive policy framework for the wind energy industry to bring forward planning applications for developments of appropriate scales in appropriate locations.

RWE note Appendix 2², 'Areas of Wind Farm Potential' of the draft County Development Plan (CDP). This map depicts just two designations of 'Preferred locations' and 'Non-preferred locations' in County Longford which do not cover the extend of the county. These designations are not accompanied by a detailed description of how they were identified in 5.8.1.1;

"The Sustainable Energy Authority of Ireland (SEAI) provides mapping data of wind speeds across the country and indicates that turbine heights above 75m-100m result in commercially viable wind speed. Typically, modern commercial turbine design heights are in excess of 140m. In this regard, the Council has identified areas of wind potential where wind energy development will be encouraged. This is illustrated in Appendix 2 of this plan."

It is unclear what is considered a 'commercially viable wind speed'. Furthermore, as turbine technology continues to advance, areas of lower wind speeds are increasingly viable for potential wind energy development. Longer rotor blades and taller nacelle towers facilitate

² <https://www.longfordcoco.ie/services/planning/preparation-of-longford-cdp-2021-2027/volume-2-appendices.pdf>

taller turbines capturing commercially viable wind speeds higher up, as mentioned in the extract above. This, coupled with larger generators creating greater outputs has resulted in smaller areas of lower wind speeds becoming potentially viable. Recently we have seen wind farms of fewer turbines with greater outputs utilising wind resource in previously commercially unviable areas. This also underscores the importance for Longford County Council to designate as much land as possible and not to exclude areas based on wind speeds.

RWE have studied appendix 2 in the draft CDP 2021-27 and appendix 5³ in the current CDP 2015-21. RWE estimate that there is approximately 120km² of potentially unconstrained lands in County Longford which could potentially host wind turbines. That is land which exclude lakes, environmental designations i.e. Natura 2000 sites and 500m distance from houses. RWE estimate appendix 2 indicates an area of approximately 60km² of 'Preferred Locations' for wind farms, designating half of this unconstrained area. Of this area, half is occupied by Derryadd wind farm, leaving only 30km² for future potential wind farms. RWE has illustrated this view with the accompanying map which further illustrates the reduction in 'Preferred Locations' in appendix 5 and appendix 2. This map also serves to highlight that the majority of the county (60-70%) is not designated at all and therefor ambiguous from a policy perspective.

For the reasons outlined, RWE would request that this map is removed in anticipation of Longford's forthcoming RES which will include designations for wind energy development accompanied by a step-by-step plan of how these areas were identified as potentially suitable or unsuitable. This will facilitate a clear and ambitious approach to wind energy development in County Longford and will assist in expediting our 2030 targets.

Longford Development Contribution Scheme 2022-2028

In Longford County Council's Development Contribution Scheme 2018 - 2022, Table 2, the amount to be charged for Category H, Industrial Wind Farm Development / Turbines is €71,600 per MW. This is over 7 times the norm of c. €10,000 charged by most other Local Authorities. This effectively renders many smaller and community wind farm projects in County Longford uncompetitive in the context of Renewable Energy Support Scheme (RESS) auctions, along with smaller commercial wind farms and will negatively affect our renewable energy targets.

The primary objective of the development contribution mechanism is to partly fund the

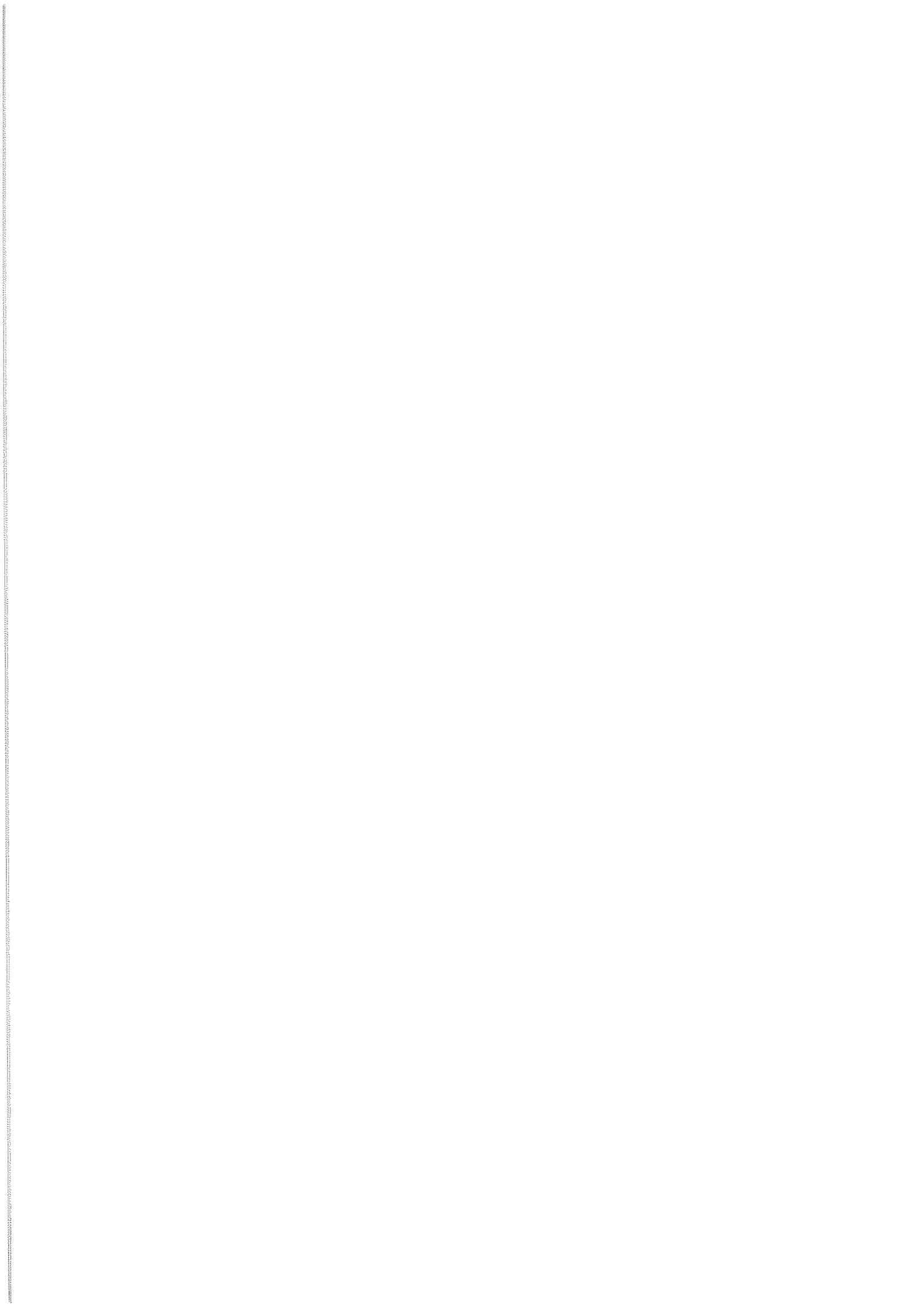
³ <https://www.longfordcoco.ie/Services/Planning/Development-Plan-2015-2021/Appendices/Appendix-5-Areas-of-Wind-Farm-Potential.pdf>



provision of essential public infrastructure, without which development could not proceed. Wind Farm developments pay directly for road upgrades, electricity upgrades, telecom upgrades and do not require any water or wastewater beyond domestic scale connections. The Ministerial Guidelines state the “development contributions are ultimately designed to offset only a portion of the costs of public infrastructure and facilities”. Additional information should be provided on the proposed use of the funds and the justification for the proposed increase to be levied on wind farms. It is also not clear why wind turbines are being subjected to such a significant charge when other forms of development will face a much smaller charge despite requiring a greater degree of infrastructure to be provided by the Local Authority.

The extremely high charges are effectively a barrier to all small and medium scale wind farms in the County. RWE urge that the Development Contribution Scheme be reviewed in this respect.

RWE believe that the prohibitively high development contribution rate coupled with a conservative approach to designating areas of potential wind energy development would have a significantly adverse impact on the development of wind energy in County Longford and any future potential contribution to the decarbonisation of the energy sector.



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This map is digitally created based on information obtained from various authoritative sources.

Every care has been taken to ensure the information is correct at the time of creation.

No responsibility can be accepted for any mishap or damages arising from inaccuracies, omissions and new developments within the mapped area.

Legend

- CURRENT NON-PREFERRED LOCATIONS
- CURRENT PREFERRED LOCATIONS
- DRAFT PREFERRED LOCATIONS



Map Title:

**AREAS OF
WIND FARM POTENTIAL**

Map Scales:

1:250,000 @ DIN A3

CURRENT LCDP 2015-21

VS

DRAFT LCDP 2021-27

