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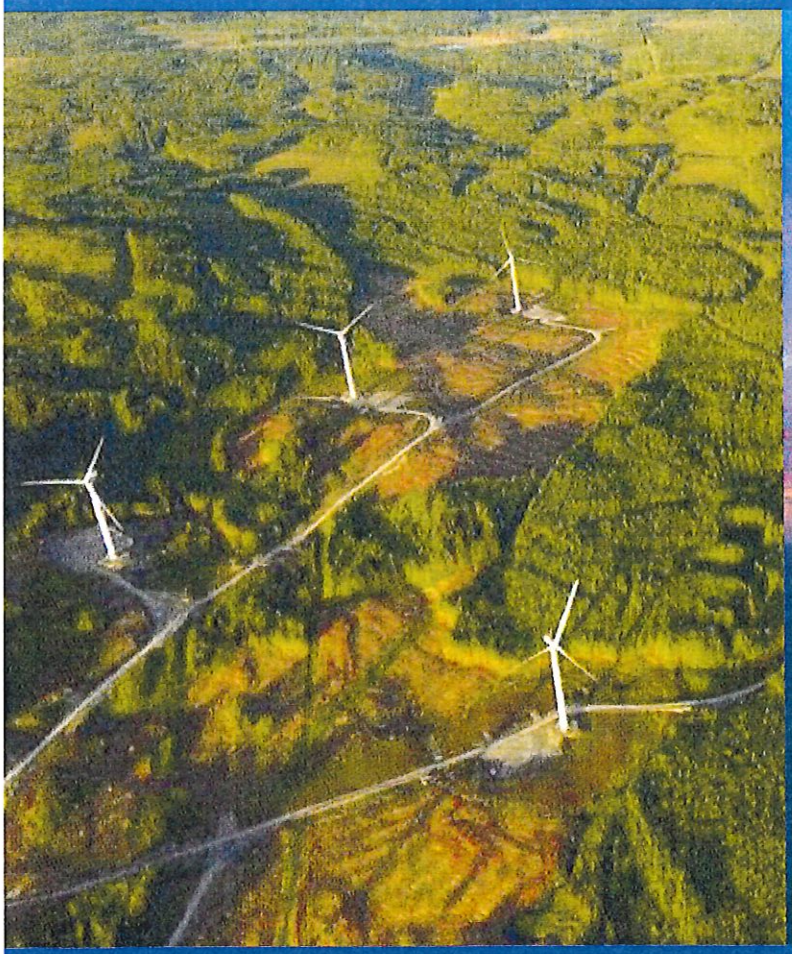

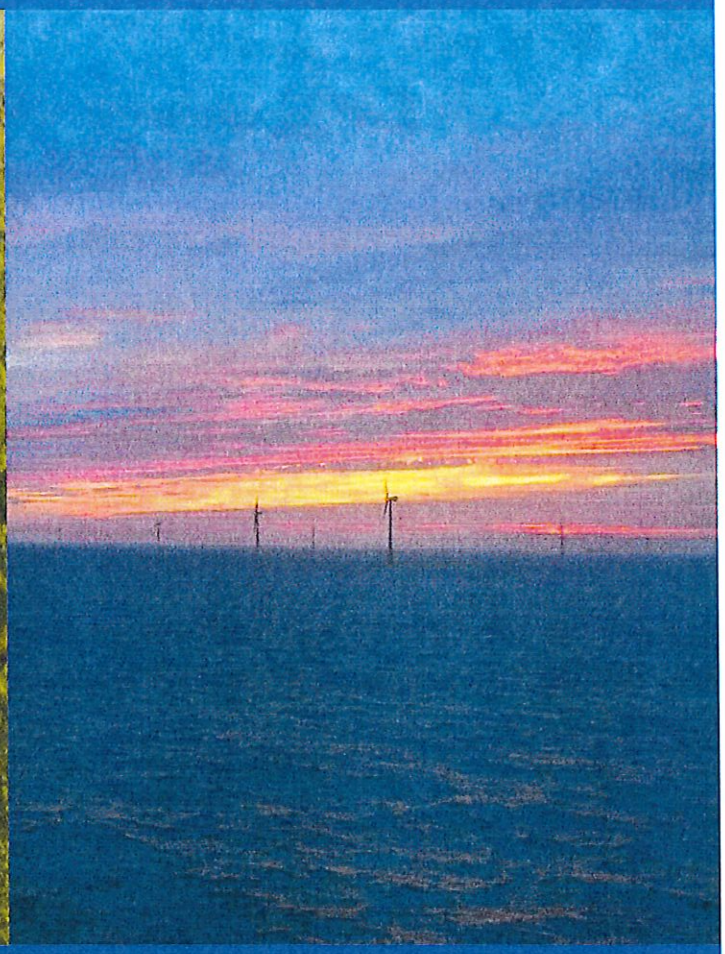

IWEA Submission on Draft stage of Longford County Development Plan 2021-2027

18th January 2021

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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 Longford County Development Plan 2021 -2027.

We have reviewed the draft plan and associated documents. We note that Longford still has no operational commercial scale wind energy developments although it is acknowledged that Derryadd Wind Farm will be constructed in the next 2 – 3 years. While we welcome the various County Policy Objectives set out in Section 5.8 of the draft County Development Plan (CDP), we note the reliance on future documents yet to be developed including the preparation of a Renewable Energy Strategy for the County and the identification, in conjunction with the Eastern and Midlands Regional Assembly (EMRA) of a Strategic Energy Zones for the EMRA Region and which may be located within County Longford. We urge that these documents be developed at the earliest possible date. We wish to make specific comment on the following:

Chapter 3: Climate Change

Chapter 5: Transport, Infrastructure, Energy & Communications

Chapter 6: Regeneration

Chapter 8: Economic Development

Chapter 9: Rural Development

Chapter 13: Green Infrastructure

Chapter 15: Monitoring, Evaluation & Implementation

Chapter 16: 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.

INTRODUCTION

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's 2020 energy target of 40% renewable electricity was a key driver in the development of wind power over the last decade. 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 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[2]. In 2019, approximately €501 million in fossil fuel imports were avoided by the use of Renewables of which €248 million was avoided by wind[3]. Wind Generation avoided 3.9 million tonnes of CO_2 emissions. These demonstrate 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 300 onshore wind farms, mostly since 2003, with a combined capacity of approximately 4,200 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.

[1] It should be noted that IWEA, like the transmission system operator EirGrid, bases these figures on the number of individual wind farm connections. Some larger wind farms may have multiple connections.
[2] https://www.linkedin.com/pulse/wind-generation-ireland-2019-martin-howley/
[3] http://www.seai.ie/publications/Energy-in-Ireland-2020-.pdf, page 54

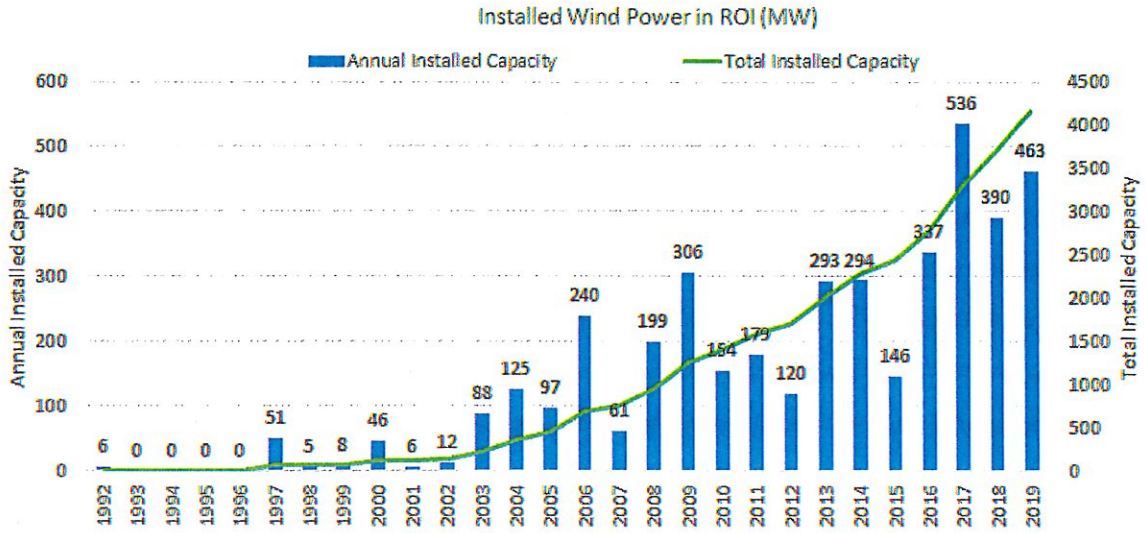


Figure 1: Installed capacity of onshore wind in Ireland since 1992

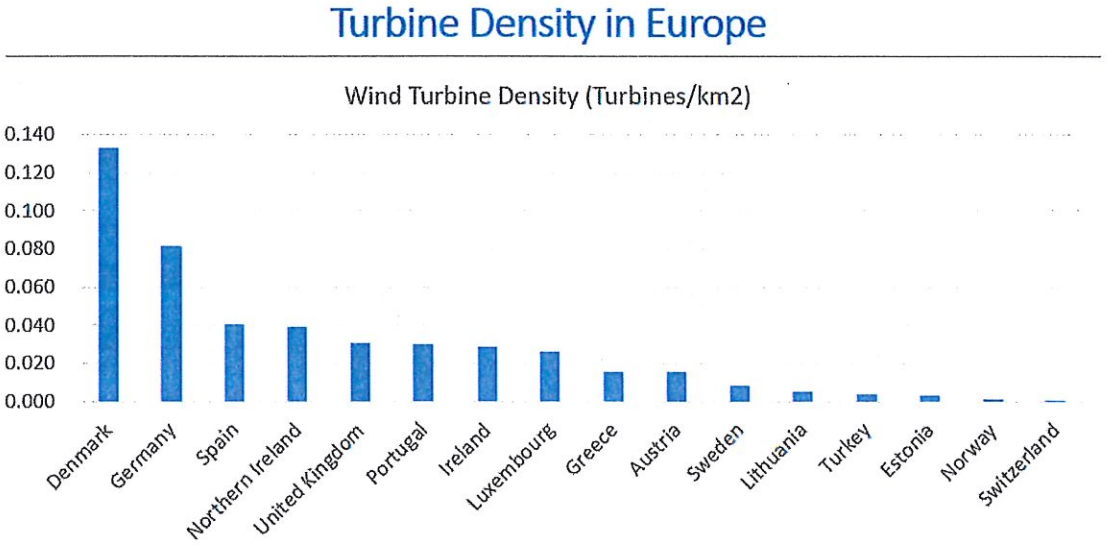


Figure 2: Turbine density in various European Countries

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 Longford Wind Energy Strategy (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[4] (Figure). The Irish people support clean, renewable, indigenous energy.

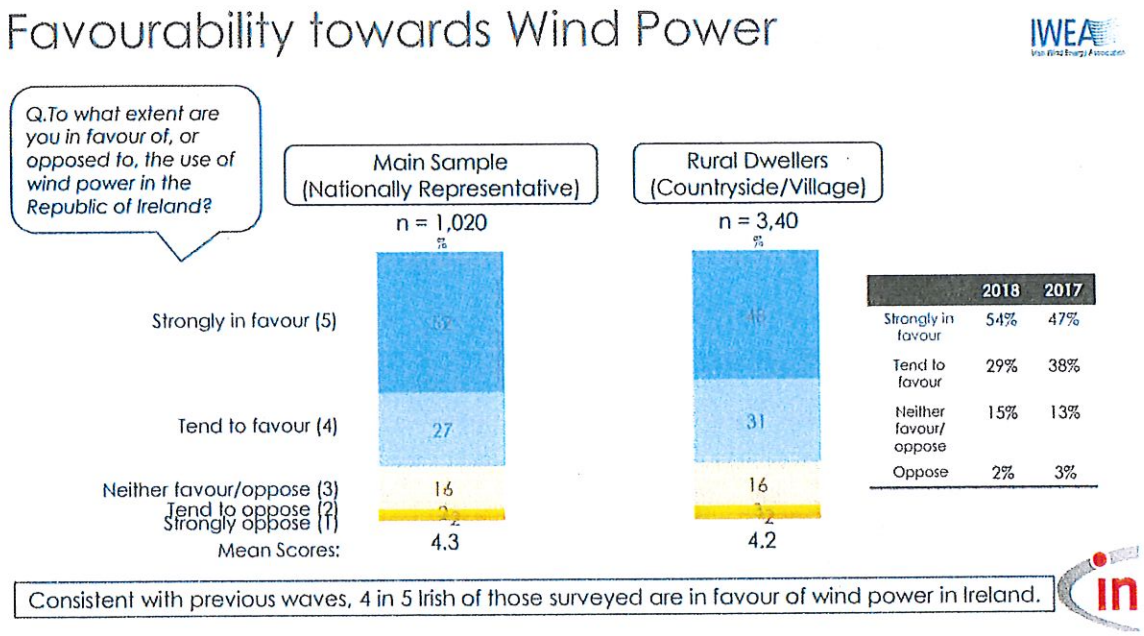


Figure 3: Results from opinion poll carried out by 'interactions' on the attitude of Irish people towards wind energy[5]

[4] ESRI Working Paper 545. October 2016.

[5] https://iwea.com/latest-news/2948-new-poll-confirms-overwhelming-majority-back-wind-energy

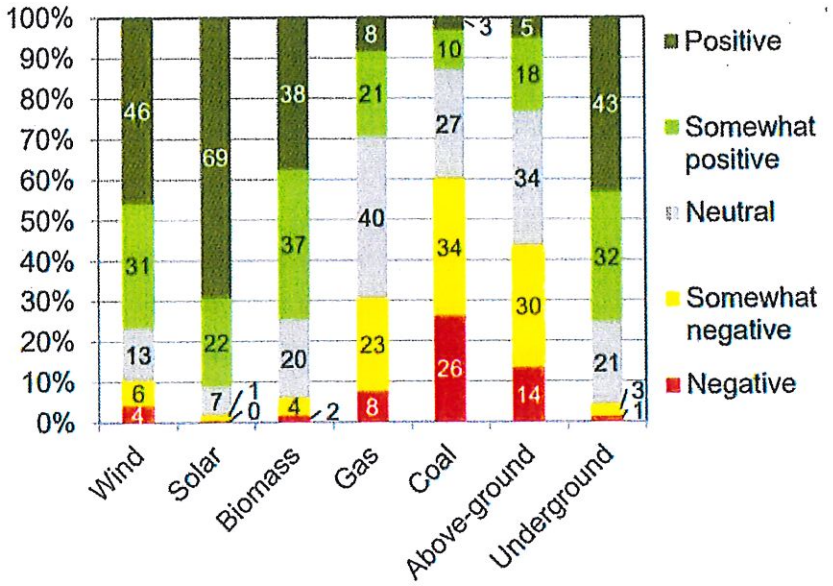


Figure 4: Irish Residents Views of Energy-Related Technologies (Bertsch et al., ESRI, Journal of Energy Policy 2017[6])

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 Longford.

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

2 Chapter 3: Climate Change

We welcome that Longford County Council is committed to making the transition to becoming a low carbon and climate resilient County. We are supportive of the provisions of the Chapter and CPO's 3.1, 3.2, 3.4, 3.8 and 3.9.

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 Chapter 5: Transport, Infrastructure, Energy & Communications

We welcome and generally support CPOs 5.124, 5.125, 5.126, 5.127, 5.128, 5.129, 5.130, 5.131, 5.133 and 5.134. However, we have specific comments on some of these CPOs.

> **CPO5.128:** Support the identification, in conjunction with EMRA, of Strategic Energy Zones, areas suitable to accommodate large energy generating projects within the Eastern and Midlands Regional Areas.

We request that the Council urge the EMRA to initiate and complete this study at the earliest possible date.

> **CPO 5.129:** Prepare a Renewable Energy Strategy for the County over the lifetime of this plan and subject to the availability of resources. This strategy will support the development of renewable energy infrastructure to deliver government objectives in relation to energy efficiency and the transition to a low carbon future.

We urge the Council to prepare this document at the earliest possible date. We note the "Areas of Wind Farm Potential" in Appendix 2 which shows only three discrete areas which are "Preferred Locations". It is not clear as to whether or not the map in Appendix 2 is the "Wind Energy" component of the forthcoming Renewable Energy Strategy for the county or if it will be revised by the forthcoming Strategy. The Appendix 2 map shows a substantial reduction in area of Preferred Locations for Wind Farms from Appendix 5 of the Longford CDP 2015-2021 to only three areas, one of which will be occupied by Derryadd Wind Farm. Our estimate is that it has reduced by two-thirds to a third of what is in the Appendix 5 of the current CDP. The reduction is such as to have only c. 60km^2 of "Preferred Area" of which half will accommodate Derryadd. This leaves little scope for future development. The basis for the reduction is not apparent within the draft CDP. It may be the case that the limited "Preferred Area" in the draft CDP 2021-2027 are based on wind speeds. However, as set out in Section 10.4 of this submission, wind speed should not be used as a constraint for site suitability as wind technology has evolved to the degree that any part of Ireland is suitable in terms of wind resource. We have enclosed further comments on the preparation of such a Wind Energy Strategy in Section 10 of this submission.

> **CPO 5.134:** Ensure environmental assessments for new energy developments should address reasonable alternatives for location. Where existing infrastructural assets such as sub-stations,

powerlines and roads already exist within proposed development areas, then such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development.

Assessment of Alternatives should be no more onerous than required by legislation i.e. in accordance with Article 5 of Directive 2014/52/EU and as may be interpreted by C JEU rulings e.g. Case C-461/17.

We welcome the aspirations contained within Section 5.8.1.1 so as to use cutaway peatland for wind energy given that many of these areas are served with an extensive electrical transmission network in place. However, it is not clear as to whether or not the map in Appendix 2 is the "Wind Energy" component of the forthcoming Renewable Energy Strategy for the County or if it will be revised by the forthcoming Strategy.

IWEA recognises the importance of Community ownership of wind farms and the part it can play in public acceptance. This principle is embodied within the Renewable Energy Support Scheme (RESS). We support CPOs 5.135, 5.136, 5.137, 5.138, 5.139, 5.140 and 5.141 as set out within Section 5.8.1.2. However, we have specific comments on some of these CPOs.

CPO 5.136: Encourage the development of wind energy in suitable locations in an environmentally sustainable manner and in accordance with Government policy and any forthcoming Renewable Energy Strategy for County Longford.

We welcome the objective to prepare the Renewable Energy Strategy for the County and comment further on this process (as may be relevant to wind energy) in Section 10 of this submission.

CPO 5.137: Encourage proposals for commercial wind energy developments to be located on cutaway peatlands in those areas identified as having wind potential within the county, as defined in Appendix 2, subject to environmental, landscape, habitat and wildlife protection requirements being addressed.

It is not clear as to whether or not the map in Appendix 2 is the "Wind Energy" component of the forthcoming Renewable Energy Strategy for the county or if it will be revised by the forthcoming Strategy. Wind speed should not be used as a constraint for site suitability as wind technology has evolved to the degree that any part of Ireland is suitable in terms of wind resource.

CPO 5.138: Ensure that the assessment of wind energy development proposals will have regard

to the following:

- sensitivities of the county's landscapes;
- visual impact on protected views, prospects, scenic routes, as well as local visual impacts;
- impacts on nature conservation designations, archaeological areas and historic structures, public rights of way and walking routes;
- local environmental impacts, including those on residential properties, such as noise and shadow flicker;
- visual and environmental impacts of associated development, such as access roads, plant and grid connections;
- scale, size and layout of the project and any cumulative effects due to other projects; the impact of the proposed development on protected bird and mammal species;
- County Longford Wind Energy Strategy (when adopted);
- Impact of the grid connection from the proposed wind farm to the ESB network.

In relation to the second last bullet point, is it the intention to have a Longford Wind Energy Strategy separate to the Renewable Energy Strategy or is Appendix 2 the Wind Energy Strategy?

CPO 5.139: Ensure that proposals for energy development demonstrate that human health has been considered, including those relating to the topics of:

- Noise (including consistency with the World Health Organisation's 2018 Environmental Noise Guidelines for the European Region);
- Shadow Flicker (for wind turbine developments, including detailed Shadow Flicker Study);
- Ground Conditions/Geology (including landslide and slope stability risk assessment);
- Air Quality;
- Water Quality; and
- Assessment of impacts on collision risk species (birds and bats).

The first 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 Wind Energy Development Guidelines, 2019. It is anticipated that these Guidelines will be finalised early this year (2021). We respectfully suggest that noise limits be covered under the new Wind Energy Development Guidelines for Planning Authorities and that the reference to the WHO Guidelines could create ambiguity and should be deleted.

4 Chapter 6: Regeneration

IWEA supports CPO's 6.86, 6.87, 6.90 and 6.91.

5 Chapter 8: Economic Development

We refer to Section 8.7.5 "The Green and Circular Economy" and Section 8.7.6 "Just Transition". While we welcome COPs 8.80, 8.81, 8.82, 8.83, 8.84, 8.85 and 8.86, we encourage the Council to 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. This is income that is currently not available to the County by virtue that no commercial scale wind farms exist.

If the next County Development Plan were to lay the right policy foundations for 250MW of wind energy development in the County over the next decade, that would result in an annual investment of over €6.25 million in the Longford economy, or €187.5 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.

There is also a boost to local economy during construction when materials such as crushed stone and concrete are purchased locally and when local personnel and plant are engaged in construction activity.

6 Chapter 9: Rural Development

We welcome, in Section 9.3.6, the Council's support for renewable energy projects in rural areas. While wind energy projects can provide economic benefit (as discussed above in our comments under Chapter 8), various infrastructural improvements can result such as road widening and resurfacing, removal of bad bends on roads and the provision of more resilient electrical infrastructure. These will have positive benefits to rural development.

7 Chapter 13: Green Infrastructure

We note the CPO's 13.1 to 13.7 in relation to the provision of Green Infrastructure. Wind energy projects contain a substantial track network and there are several wind farms that incorporate amenity facilities for community use (e.g. Sliabh Bawn Wind Farm, Co. Roscommon).

Consideration should be given to the inclusion of future wind farm tracks as part of a greenway network within the County.

8 Chapter 15: Monitoring, Evaluation & Implementation

We note the various potential funding streams as set out in Chapter 15.

Development Contributions and Rates are effectively funding streams which could be considered under the last part of 15.5.2 "Any other funds as deemed relevant by EMRA, the local authority or other relevant agency".

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.

The primary objective of the development contribution mechanism is to partly fund the 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. We urge that the Development Contribution Scheme be reviewed at the earliest possible date.

9 Chapter 16: Development Management Standards

WE note in Section 16.4.17, the proposed development standards for renewable energy developments.

We submit that the opening paragraph of this section should also reference the forthcoming Renewable Energy Strategy.

10 County Longford's Wind Energy Strategy

10.1 Approach

Longford County Council is to be commended for its objective of the preparation of a Renewable Energy Strategy. Presumably, this will include an updated Wind Energy Strategy. This will provide a plan-led, supportive policy framework for the wind energy industry to bring forward planning applications for developments of appropriate scales in appropriate locations. We request that the proposed Appendix 2 to the CDP be withdrawn until such time as the Renewable Energy Strategy, including Wind Energy Strategy as an integral part, has been prepared.

By now initiating the preparation of a new Wind Energy Strategy (WES) for County Longford as part of the preparation of the Longford County Development Plan 2021-2027, Longford 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 and bearing in mind that Longford currently has no operational commercial scale wind farm.

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 Longford's significant area, good wind energy resource, excellent electricity transmission infrastructure, and as county with a heritage of electricity generation, County Longford 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 Wind Energy Development Guidelines (due to be finalised later this year) and that the new CDP and WES for County Longford refers to these Guidelines and require future proposed wind energy developments in County Longford 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.

10.2 Designations

We note that there is no step by step process of development of the Appendix 2 map which has yielded just two designations viz:

- Preferred Locations
- Non-Preferred Locations

We respectively submit that the map be withdrawn until such time as the step by step process has been fully undertaken such that there is a reliable basis for the County's Wind Energy Strategy.

10.3 Policy Ambition

IWEA encourages Longford County Council to take an ambitious approach in deciding the actual installed capacities of wind energy in the new WES for County Longford. 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 Longford County Council will need to be making provision for. In this absence of such guidance, Longford 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,

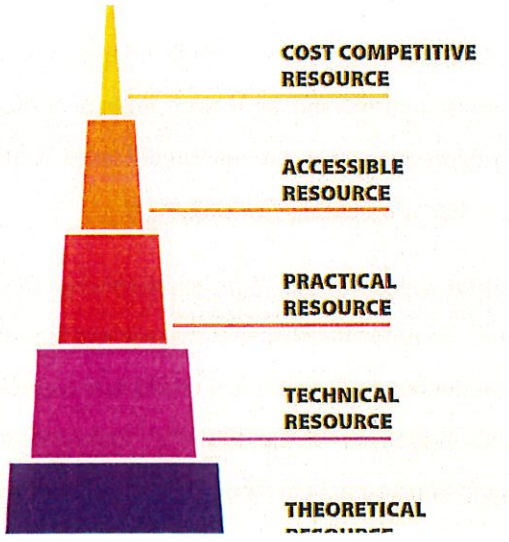


Figure 5: Geographical representation of sieve analysis approach (Methodology for Local Authority Renewable Energy Strategies, SEAI)

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.

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.

Longford 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 Longford 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 Longford is critical to guide the strategy and the identification of a sufficient quantum of potentially suitable land. For example, If Longford County Council wanted to identify areas sufficient to accommodate 400MW, it should be able to do so. Equally, if Longford 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 Longford County Council should dictate the criteria used in preparing their wind energy portion of the new WES for County Longford, rather than just "running" a standard approach and seeing what the strategy ends up with.

Longford County Council will be aware of the Department of Housing, Planning and Local Government's (DHPLG) February 2020 public consultation on the Draft Revised Wind Energy Development Guidelines, 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 Wind Energy Development Guidelines, IWEA has already suggested that the step-by-step guide outlined in Section 3.6 Draft Revised Wind Energy Development Guidelines 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 Longford County Council, we encourage the Council to engage with the County Councils of Cavan, Leitrim, 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 Longford, IWEA urges Longford 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 Longford 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 County, 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

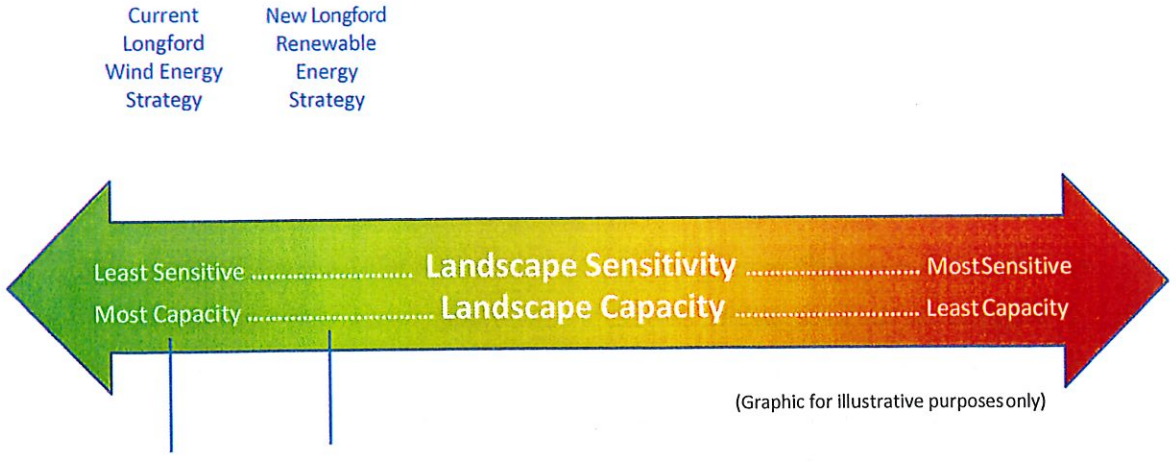
western extremity has been excluded based on wind sped but that visual impact comes into play in this one also.

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.

10.5 Landscape Capacity and Landscape Sensitivity

Historic 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.



(Graphic for illustrative purposes only)

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 Longford to fulfil the State's onshore wind energy and renewable energy ambitions. The most scenic parts of County Longford can still be protected and deemed not normally permissible for wind energy in the new WES for Longford, 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.

10.6 Extent of Land Designated in Draft WES

We note the extent of lands designated in the draft Appendix 2. This map shows three "Preferred Locations" having only a third of the areas shown in Appendix 5 of the current CDP. The three areas in Appendix 2 of the draft CDP constitute c. 60km^2 of which half (the largest of the three areas) will be occupied by Derryadd Wind Farm. This leaves little scope for the future development of wind energy in the County.

10.7 Regional Approach

IWEA acknowledges that Longford County Council is only responsible for its own functional area and that the new CDP and WES for Longford will only extend as far as the Longford boundary.

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.