

Sub 53

Deirdre Skelly

From: Denis Devane <denis@windenergyireland.com>
Sent: Tuesday 10 August 2021 14:37
To: cdp
Subject: EXTERNAL - Material Alterations to the Draft Longford County Development Plan 2021-2027
Attachments: 10082021 WEI Submission Letter to Draft Longford CDP 2021-2027.pdf

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To Whom It May Concern,

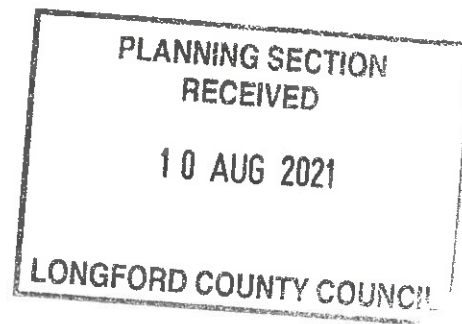
The Wind Energy Ireland (WEI) welcomes the opportunity to make this submission to Longford County Council's Material Alterations to their 'Draft County Development Plan 2021-2027'.

Please find our submission attached.

If you have any questions please do get in contact with me.

Best, Denis

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Wind energy has cost €1 / person / year from 2000-2020



Wind energy will be the cheapest & the greenest electricity in Ireland

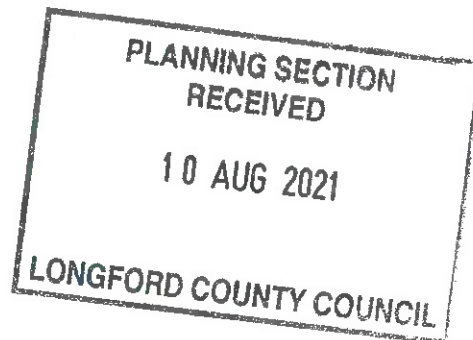


We can achieve a 70% renewable electricity target in Ireland by 2030

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10th August 2021



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Re: Material Alterations to the Draft Longford County Development Plan 2021-2027

Dear Sir/Madam,

Wind energy Ireland (WEI) welcomes the opportunity to make this submission on the Material Alterations to the draft Longford County Development Plan 2021-2027. WEI have a number of comments with the Proposed Material Amendments (Proposed Plan) in relation to wind energy. These are detailed in the following submission.

1. New Policy Objective before CPO5.123

We support this policy objective as the ongoing development of the electricity transmission and distribution grid is essential to bring new renewable energy sources of electricity into service. However, for the avoidance of doubt, we suggest that “lines” be replaced with “overhead lines, underground cables”.

2. New Text in Section 5.8

The first two sentences effectively constitute an objective while the balance of the text is effectively an assessment.

We set out below targets in Section 7.2 of the Climate Action Plan 2019:

“To meet the required level of emissions reduction, by 2030 we will:

- *Reduce CO₂ eq. emissions from the sector by 50–55% relative to 2030 Pre-NDP projections*
- *Deliver an early and complete phase-out of coal- and peat-fired electricity generation*
- *Increase electricity generated from renewable sources to 70%, indicatively comprised of:**
 - *at least 3.5 GW of offshore renewable energy*
 - *up to 1.5 GW of grid-scale solar energy*
 - *up to 8.2 GW total of increased onshore wind capacity*

- *Meet 15% of electricity demand by renewable sources contracted under Corporate PPAs*

*[*The exact level of offshore wind, onshore wind, solar and other renewable technology will be determined by a new system of competitive auctions where the lowest cost technology will be determined, see box below.]**

The Council's new text relates (incorrectly) to a national target of 4GW of additional renewable energy whereas the total onshore target is 9.7GW (up to 8.2GW of increased onshore wind and up to 1.5GW of solar). The common interpretation is 4GW of additional wind plus 1.5GW of solar.

We respectfully suggest that the County targets be such as to deliver 100% of its future electricity needs. The future use would be expressed in MWh or GWh on an annual basis. The capacity factor for wind farms is typically in the range of 30-40%, whereas solar farms have a capacity factor of 9 – 12%. Thus, for each MW of installed capacity of a wind farm, approx. 3MW of installed solar farm is required to produce the same amount of electricity over an average year. Because of the differences in generating abilities of different technologies, it is not correct to simply list the rates installed capacity of potential projects.

It should be noted that the planning approval for the Derryadd Windfarm has been quashed (The High Court, Judicial Review 2020 No. 557 JR Judgement of Justice Humphreys delivered on 16th June, 2021) but, hopefully, will be granted at a future date.

Accordingly, we respectfully suggest that the new text should state:

“The Council will undertake an assessment of the metrics including an assessment of the proportion of national renewable energy targets to be allocated for County Longford. This assessment will form part of a Renewable Energy Strategy for the County.”

3. Amendment to Policy Objective CPO5.129

The additional sentence *“The Strategy will include a Wind Energy Strategy for the County”* is welcomed.

4. New Policy Objective after CPO5.134

Alternative grid connection routings are required as part of the Environmental Impact Assessment process. However, the text, as presented in the new policy objective appears to suggest that grid connections would only be placed in roads as a last resort. We draw your attention to the 110kV, 220kV, 400kV Cable Functional Specification and Technical Schedule – see slides of workshop of June 2021. Please see slide 8 which states:

“High Voltage cable installation across third party lands is to be avoided where possible.” and

“In order to facilitate access for installation and maintenance, the cable route as standard shall follow public roadways, footpaths or green areas under the control of the relevant Local Authority.” and

“Underground cables shall, as a standard, be routed within the reserve of public roads.”

It is imperative that grid connections can be built to the technical standards of the Transmission System Operator (EirGrid) and Distribution System Operator (ESB Networks) and the grid connection asset owner on completion of the project (ESB Networks).

We also wish to draw your attention to the grid connection for the Upperchurch Wind Farm, Co. Tipperary.

Planning permission was refused by An Bord Pleanála for the construction of a an 110kV electrical substation and 110kV underground electrical cabling from the proposed substation to an already consented windfarm 110kV electrical substation and all ancillary works under appeal reference PL92.301959 on the 17/12/2018.

The Inspector in the determination of the appeal considered that the Applicant had not adequately assessed alternatives as part of the EIAR. Paragraph 8.5.14 & 8.5.15 of the Inspector’s report stated that:

“The consideration of alternatives is an information requirement of Annex IV of the EIA Directive, and the single most effective means of avoiding significant environmental effects. Having regard to this requirement and its purpose (i.e. avoidance of significant environmental effect), I am not satisfied that the consideration of alternatives is adequate as no information has been provided in relation to the consideration of alternative grid connection technologies such as overhead line alternatives. Furthermore, no information has been provided in relation to alternative connection locations where the windfarm could potentially connect to the national electricity grid. This in my view is a significant deficiency in the EIAR.”

8.5.15 *“In conclusion, I am not satisfied that the applicant’s consideration of potential route options is robust and undue weight has been given to matters pertaining to impacts on the local road network over environmental matters, particularly biodiversity. Whilst the concerns of Tipperary County Council are noted, having regard to the recent decision regarding the Bunkimalta windfarm grid connection referenced above, I am not satisfied that it has been reasonably established that potential adverse impacts to the road fabric and potential disruption including road closures could be not be mitigated through appropriate construction and traffic management. The selected route option will result in a significant intervention on the natural environment and may have indirect impacts on the integrity of the Slievefelim to Silvermines Mountains SPA due to the loss of foraging habitat suitable for the Hen Harrier species (see section 10 for further assessment of this issue). Furthermore, I am not satisfied that the applicant has provided adequate consideration of alternative grid connection technologies such as an overhead line option or ABP-301959-18 Inspector’s Report Page 52 of 138 alternative connection*

locations where the windfarm could connect to the national grid with potentially less environmental consequences.”

Thus, a robust assessment of alternatives needs to be conducted for each project. We recommend that the new Policy Objective be removed.

5. Policy Objective CPO5.139

There is still some uncertainty in relation to the date of publication of the new Wind Energy Development Guidelines. We suggest that the amendment be rephrased to:

“and have regard to the forthcoming Wind Energy development Guidelines (a draft of which was published in December 2019)”.

6. Development Contribution Scheme

As set out in our Submission of January 2021 on the Draft County Development Plan 2021-2027, we recommend a revision of the County’s Development Contribution Scheme so as to be in line with that of other Local Authorities and not be punitive to wind.

Given the findings of the Intergovernmental Panel on Climate Change (9th August 2021), it is imperative that each County do its best to progress initiatives to limit climate change. We recommend that the preparation of the County’s Renewable Energy Strategy proceed at the earliest possible date.

WEI thank Longford County Council for the opportunity to engage on these matters and welcome any clarifications that may arise.

Yours sincerely,

[email submission]



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ENDS