

PUBLIC CONSULTATION ON LOUTH DRAFT COUNTY DEVELOPMENT PLAN

SSE Submission

December 2020

SSE SUBMISSION ON LOUTH DRAFT COUNTY DEVELOPMENT PLAN

Introduction

SSE wishes to make this submission for consideration as part of the *Draft Louth County Development Plan* consultation. SSE welcomes the publication of this draft and supports the central role that County Development Plans will play in implementing the National Planning Framework (NPF).

SSE welcomes the recognition given to climate action in the Louth's draft CDP. While, tackling the Covid-19 pandemic will continue to be our national priority, the climate emergency has not gone away. Delivering on the commitments of Ireland's Climate Action Plan and ensuring we are able to meet our Paris Agreement obligations are critical priorities. As we seek to move beyond the Covid-19 crisis, there is a need to ensure our economy is cleaner and more resilient. Investing in a green recovery has the potential to create thousands of sustainable jobs in County Louth and contribute to ensuring a Just Transition.

Who we are

At SSE we're proud to make a difference. From small beginnings we've grown to become one of Ireland's largest energy provider, supplying green electricity and natural gas to over 700,000 homes and businesses on the island. We are driven by our purpose: to provide energy needed today while building a better world of energy for tomorrow.

Since entering the Irish energy market in 2008 we have invested significantly to grow our business here, with a total economic contribution of €3.8bn to Ireland's economy over the past five years. We own and operate 890MW of onshore wind capacity across the island. Our portfolio includes Ireland's largest onshore wind farm, the 174MW Galway Wind Park, which was jointly developed with Coillte.

As a leading developer of offshore wind energy in Great Britain, we believe offshore wind has the potential to transform Ireland's response to climate change. SSE is currently progressing the development of a consented offshore windfarm off the coast of Co. Wicklow - Arklow Bank Wind Park Phase 2. We also have plans to progress projects at Braymore Point off the coast of County Louth and a project in the Celtic Sea.

Renewable electricity – onshore wind

a) Role of onshore wind in Ireland

With over 4,000MW installed, onshore wind is an Irish success story and an area of climate action where, as a country, we can claim to be a world leader. The SEAI Energy in Ireland 2019 report confirmed that in 2018 alone, wind energy avoided 3.15 million tonnes of CO₂ and cut our fossil fuel import bill by €432 million¹. The benefits of onshore wind go beyond climate action. Wind energy generates economic benefits during construction and throughout the operational life of the development through rents payable to landowners, community benefit schemes, job creation and commercial rates

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

payable to Local Authorities. For example, the construction of Galway Wind Park is estimated as supporting 1,657 years of full-time employment in Ireland and contributing over €88.7m to the economy. €20million was spent with local suppliers during the construction phase of the project².

We strongly believe in playing our part by contributing to the social, environmental and economic well-being of communities surrounding our projects. To date, the SSE Airtricity Community Benefit Fund has allocated over €6.5m to community projects close to our wind farms.

b) Ensuring consistency with national policy

The Climate Action Plan commits to reaching 70% renewable electricity by 2030 through doubling Ireland's onshore wind capacity to 8GW and installing at least 3.5GW of offshore wind. The recently agreed Programme for Government has increased this offshore wind target to 5GW. To put the scale of this welcome ambition into context it should be noted that it has taken 20+ years to achieve the current level of renewable generation. The challenge is now to achieve more than twice as much in half the time. We recommend that these national targets be reflected in Louth's County Development Plan. It is critical that onshore wind continues to be recognised and facilitated in the county. We welcome the Council's commitment to "continue to support and encourage the principle of wind energy development" and the inclusion of map 10.1 which identifies suitable areas in the county for future wind energy development. We would like to encourage Louth County Council to produce a Wind Energy Strategy that builds on this map.

We would urge Council to ensure Louth's Wind Energy Strategy and overall approach is consistent with the Wind Energy Development Guidelines. The consistent implementation of the Wind Energy Development Guidelines – a key piece of national policy currently under review - is of crucial importance to ensuring the development of onshore wind in the county is not unnecessarily restricted. As a responsible developer, SSE is committed to best practice in developing our projects. The clear and consistent application of standards enable us to progress projects with confidence and will enable Co Louth to realise the investment benefits associated with renewables on a par with the rest of the country; unclear standards discourage investment and can result in protracted planning processes.

SSE would like to highlight that turbine technologies have advanced significantly in the past decade and this trend is set to continue. For this reason, we suggest the SEAI Wind Atlas, theoretical ESB wind data, or any similar general wind resource data, is not used as criteria for considering areas suitable for wind developments within the County. Wind farm developers will carry out wind assessment studies before progressing an application to planning to ensure that a site is technically and commercially viable. In addition, we recommend that existing grid constraints are not considered hard constraints when identifying areas. Grid capacity is a technical and electrical engineering constraint that is managed by the TSO/DSO and new infrastructure is generally provided on the basis of there being a need to connect permitted wind energy developments to the electricity grid; it is rarely proactively built out in anticipation of unpermitted projects. Both of these issues represent commercial and technical challenges for the wind farm developer to navigate and will stymie development if factored into Co. Louth's Renewable Energy Strategy.

Developments in wind turbine technology are also relevant to the issuing of planning permissions. New turbine technologies can operate longer than those initially developed in the 1990s and 2000s. In addition, turbines are often outliving what was initially considered to be their projected lifespans. It is therefore necessary that new consents allow for 30-35 years operation at a minimum so as not to unnecessarily limit the operation of the development.

² Galway Wind Park Sustainability Impact Report: https://www.sserenewables.com/media/ggxao1fx/galway-wind-park_sustainability-impact-report_web.pdf

We recommend Louth County Council engage closely with neighbouring local authorities and with other local authorities in the region to ensure a consistent approach to wind energy. The Regional Assembly is well placed to play a coordinating role in this regard as acknowledged in Louth's draft CDP.

We recommend the above issues be considered to ensure that County Louth does not unnecessarily restrict the quantum of land available for wind energy development. Within that strategy, of course, planning applications would be assessed on their merits.

c) Repowering

Repowering will begin to emerge as a trend during the course of the next decade. Ireland has almost 4000MW of onshore wind generation currently. As highlighted above, wind turbines installed during the 1990s and 2000s were typically designed to operate for 20-25 years though many have been able to exceed this. As turbines near end-of-life, repowering or life extension provide an alternative to decommissioning that can provide a host of benefits. Installing modern technology on these sites can be cheaper than new builds, reduce the number of turbines, utilise existing connection infrastructure where possible, result in lower energy costs and prices, and increase our energy security. We recommend the Council include a policy in support of repowering in the CDP.

Recommendations:

- The consistent implementation of the Wind Energy Development Guidelines – a key piece of national policy currently under review - is of crucial importance. We would urge the council to not go beyond what is required by the WEDG to ensure compliance with national policy.
- We recommend Louth County Council engage closely with neighbouring local authorities and with other local authorities in the region to ensure a consistent approach to wind energy.
- We recommend the SEAI Wind Atlas, or any similar general wind resource data, is not used as a constraint when identifying suitable areas for onshore wind.
- We recommend that existing grid constraints are not considered hard constraints when identifying areas.
- New consents need to allow for 30-35 years operation at a minimum so as not to unnecessarily limit the operation of the development and ensure developers are able to build a strong business case at the outset.
- Repowering will begin to emerge as a trend during the course of the next decade. We recommend the Council include a policy in support of repowering in its CDP.

Offshore wind

Offshore wind presents significant opportunities for County Louth. The Programme for Government has set a 5GW offshore wind target by 2030. We believe projects along the East and South Coast will be needed to reach this ambitious target. We welcome IU 55 which seeks to support the development of off shore windfarm developments subject to normal planning considerations.

The sustainable development of offshore wind can provide significant socio-economic opportunities for coastal communities in Ireland. The transformative impact of offshore wind is evident in the experience of our nearest neighbour. In Great Britain it has been estimated that every 1GW of offshore wind capacity installed delivers an economic boost of €2bn to the economy³. The UK's offshore renewable industry is fuelling vital investment in the domestic supply chain, building vibrant economies and supporting thousands

³ ORE Catapult (2017), 'The economic value of offshore wind': <https://ore.catapult.org.uk/app/uploads/2017/12/SP-0012-The-Economic-Value-of-Offshore-Wind-1.pdf>

of skilled jobs. 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 2040⁴.

SSE is in the early stages of developing an offshore wind farm at Braymore point off the Coast of Co. Louth. Subject to achieving the necessary consents and route to market, it can be built by 2030 and make a contribution to Ireland's EU emissions targets. Braymore Offshore Wind Farm will create significant employment and investment opportunities. SSE's consented Arklow Bank project is currently sustaining circa 120 direct, indirect and induced jobs. We estimate that the Arklow Bank will sustain over 500 jobs, including direct, indirect and induced roles during the construction phase and over 200 jobs during the operation phase.

Offshore wind will also provide opportunities in terms of onshore infrastructure and ports. We welcome IU 56 which seeks to ensure that terrestrial developments along the coastline provide adequate provision for connection to the national grid for off-shore wind farms. We also welcome the inclusion of IU67 which commits to supporting and facilitating the reinforcement and development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the County and Region.

SSE believes that offshore wind energy can act as an enabler to unlock new infrastructure investment in the Region's ports. Ports off the East Coast are important centres where future renewable and offshore energy projects could be based to stimulate new employment and investment opportunities. A recent report by the Carbon Trust on Ireland's offshore wind potential found that all of the existing ports assessed have some level of capability of serving as Operation & Maintenance bases.⁵

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. We welcome ENV47 & 48 which commits to implementing and accommodating changes that may arise due to the National Marine Planning Framework and the Marine Planning and Development Management Bill once enacted.

Recommendation:

- SSE recommend that Louth's CDP recognises the potential opportunities for the County with regard to offshore wind and ensure policies and approaches taken onshore are consistent with enabling the delivery of 5GW offshore wind by 2030.

Security of supply

European environmental policies including the Industrial Emissions Directive are necessitating a move away from traditional fossil fuel powered stations. As Ireland's largest renewable energy developer with 29 onshore wind farms in Ireland and plans to develop Ireland's first large-scale offshore wind farm, we are leading the way in seeking to help grow Ireland's renewable energy share. While the increase in renewables is necessary and to be strongly welcomed, flexible, thermal generation which can provide low carbon, efficient baseload power will continue to be required. It is needed to provide system stability and to support a renewables-led transition, for example when demand is high and wind or solar generation is low. Ireland's Single Electricity Market has signals to ensure renewable generation is dispatched first and ensure sufficient volume of capacity is procured to meet security of supply through the Capacity Market.

⁴ SEAI Wind Energy Roadmap 2015: https://www.seai.ie/publications/Wind_Energy_Roadmap_2011-2050.pdf

⁵ Carbon Trust, 'Harnessing our Potential: Ireland's Offshore Wind Opportunity'; <https://www.iwea.com/images/files/final-harnessing-our-potential-report-may-2020.pdf>

A recent report by MAREI/EAI found that while wind energy will be the main driver of decarbonisation, the reliable delivery of electricity requires conventional generation to play a necessary role providing energy, system services and flexibility. The required gas fired capacity in 2030 is projected to be similar to today, but gas fired generation will operate less [~20% less energy compared to 2019 (or ~ 4 TWh less)]⁶.

It remains to be seen how policy and market signals for thermal generation in Ireland will develop. We may see opportunities for Carbon Capture and Storage (CCS) or Hydrogen emerge over time to decarbonise new and existing thermal stations.

Recommendation:

- We would encourage Louth County Council to recognise the importance of ensuring the continued use, reuse or repowering of existing infrastructure where appropriate to enable Ireland to meet its energy needs.
- Opportunities for shared CCS and hydrogen infrastructure to decarbonise conventional generation, industry and transport should also be supported.

Energy efficiency and the electrification of heat

SSE believes that energy efficiency should be seen as an infrastructure priority in Louth's County Development Plan. Energy efficiency not only helps Ireland achieve its climate action objectives, it also reduces energy bills and improves health and social inclusion. It can also help create jobs and drive a green recovery as emphasised in the Programme for Government. The Climate Action Plan contains ambitious plans to improve energy efficiency and drive the electrification of Ireland's housing stock with 500,000 deep retrofits planned. SSE believes that energy efficiency in combination with the electrification of heat will lead the way in realising Ireland's decarbonisation potential. We welcome the ambitious plans for heat pump installation in the Climate Action Plan.

A partnership approach and continued collaboration between energy suppliers, the SEAI and local authorities will be vital given the scale of energy savings required in the next decade. We are proud of the work we have undertaken to date and look forward to continuing this as part our 'one-stop-shop' for energy efficiency which we recently launched in partnership with An Post⁷. We believe our 'one-stop-shop' solution can lead the way in achieving the national retrofit programme ambition to deliver 500,000 deep retrofits by 2030. Our aim is to provide a solution that addresses key barriers to retrofit including complexity, consumer hesitance and access to finance. We believe our recently launched partnership with An Post can unlock demand for energy efficiency measures and kickstart activity this year and next.

We recommend Louth's County Development Plan reflect Action 64 in the Climate Action Plan which seeks to increase the energy efficiency of Local Authority social housing stock. We would encourage the Council to work with SEAI to target local authority housing stock and competitively tender for the delivery of deep retrofit works to ensure high quality and cost-effective outcomes.

Recommendation:

- We welcome the priority that has been attached to energy efficiency in Louth's draft CDP. We recommend Louth's County Development Plan reflect Action 64 in the Climate Action Plan which seeks to increase the energy efficiency of Local Authority social housing stock.

⁶ MAREI/EAI, 'Our Zero Mission Future': <https://eaireland.com/wp-content/uploads/2020/11/Our-Zero-e-Mission-Future-Report.pdf>

⁷ <https://www.anpost.com/Green-Hub/Home-Energy-Upgrade-Service>

Electrification of transport

Transport as a sector is the most significant contributor to our national Green House Gas (GHG) emissions. Sustainable transport policies are of particular importance given the predominance of private cars. Given the predominance of the private car, encouraging a modal shift towards public transport and cycling is key alongside the electrification of transport. The Climate Action Plan envisages one million EVs on Ireland's roads by 2030.

We welcome MOV6 and MOV7 in Louth's draft CDP which supports the growth in the use of EVs; prioritises car parking spaces for these vehicles; and seeks to facilitate the provision of charging infrastructure where considered appropriate. The deployment of targeted electric vehicle charging infrastructure across the county will be vital to meet the changing needs of commuters.

We welcome the objective to facilitate a modal shift towards sustainable transport options, encouraging the use of electric vehicles by ensuring EV infrastructure is in place, and to work with transport providers to develop public transport options across the county, both in urban and rural areas.

Recommendation:

- Spatial planning at a local authority level will be critical to drive the electrification of transport. Louth's CDP should go further than the policies currently outlined to identify areas where EV charge points could be installed and competitively tender for these assets.

Public lighting and smart technologies

Public lighting infrastructure is also an area which should be considered as part of Louth's next County Development Plan. We recommend that local authorities strive to achieve 100% conversion to LED lighting to reduce energy consumption. As a public lighting contractor with responsibility for maintaining over 275,000 streetlights on behalf of 15 local authorities across Ireland, we understand the benefits that LED retrofit projects can bring and have experience carrying these out across the county. Upgrading public lighting infrastructure can lead to significant energy savings (30%+), reduced carbon emissions, improved lighting levels and reduced maintenance costs. The upgrades necessary to ensure compliance with safety standards should also be prioritised. Much of the lighting infrastructure across the country has been in place for a significant period of time. We recommend local authorities develop an improvement plan to implement remedial actions and introduce the long-term improvements needed to avoid unnecessary incidents on public light systems.

We believe there are also opportunities for smart city technologies to be utilised in County Louth to assist in working towards sustainability targets and Climate Action Plan ambition. Smart city technology can assist with energy reduction but also other areas like data collection where assets provide real time data on street lighting energy usage, atmospheric pressure, CO2 emissions and average noise pollution levels. This information can be used to support strategic decision-making. The delivery of this smart environment will help make cities safer for walking home at night, improve reporting on toxic pollutant levels, maximise financial savings, and ultimately achieve a better quality of life for residents.

Smart city technologies can also help integrate public lighting infrastructure with EV charging therefore reducing the amount of street furniture and freeing up more space for walking and cycling. Fingal County Council have become the first council to install smart columns. The Smart Column fulfils its initial function of providing valuable street lighting but also has a built-in technology in the column door to allow Electric Vehicles to plug in and charge whilst parked on the street. SSE Airtricity Utility Solutions worked with Fingal County Council to implement these changes in a safe and timely manner. We recommend Louth County Council implement similar technologies and innovations.

Recommendations:

- We recommend that local authorities strive to achieve 100% conversion to LED lighting to reduce energy consumption.
- Much of the lighting infrastructure across the country has been in place for a significant period of time. We recommend local authorities develop an improvement plan to implement remedial actions and introduce the long-term improvements needed to avoid unnecessary incidents on public light systems.
- We believe there are also opportunities for smart city technologies to be utilised in County Louth to assist in working towards sustainability targets and Climate Action Plan ambition.

Conclusion

The Louth County Development Plan is an opportunity to define the focus of future investments in the County and to ensure that employment opportunities and the services needed to support them will be delivered. The implementation of Project Ireland 2040 and the Climate Action Plan can deliver a long-term strategic planning and economic framework for the development of the County.

SSE is available to discuss any aspect of our response if that would be helpful to Louth County Council.