



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, Louth 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 country'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 bill 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.

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

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Chapter 5: Economy and Employment

RWE supports Louth County Council's Section 5.19.2 & Material Alteration No. 61:

'The changing pattern of employment in agriculture has resulted in a new approach to the sustainable use of the countryside. Farm diversification has been identified as a method of broadening the employment base of rural areas and providing an alternative source of income to traditional farming methods. Examples include renewable energy development, energy crops, forestry and forestry recreation, rural tourism such as open farms/pet farms or equestrian activities, and the production of speciality products such as cheese or beef or artisan food and drink on a farm. This Draft Plan will support rural diversification projects subject to the use and scale of the development being compatible with the surrounding area.'

In an ever changing economy and subsequent to the most recent Covid-19 pandemic farm diversification could bring about significant economic benefits to a rural economy. Promoting the potential use of renewable energy in terms of farm diversification not only serves upon delivering on national targets around climate change but also could have significant direct economic benefits to Louth. This could help in reducing reliance on imported fuels as well as well as having the potential to create jobs locally which will again contribute to the local economy.

RWE also supports comments made in Section 5.19 of the draft plan which highlight that 33.9% of the population of Louth live in rural areas. The plan states that it:

'supports the sustainable development of rural communities and seeks to the address the challenges they are facing. It will support job creation, social inclusion, the rejuvenation of towns and villages, and improvements to infrastructure including transport and broadband.'

Recognising the importance of the rural community of Louth is important for its continued growth and to Louths economy as a whole. Investment in areas such as renewable energy and in particular wind energy, as highlighted throughout this submission can have direct economic benefit to these economies.

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Chapter 10: Utilities

RWE commend Louth County Council on recognizing the importance of energy infrastructure to the counties development. Section 10.5.1 states that:

'Louth requires world class energy infrastructure which is fit for purpose and, in this regard, our native renewable energy sources need to be developed. Such development will reduce dependence on fossil fuels and external sources, improve energy mix and provide a secure and resilient supply, reduce greenhouse gas emissions creating environmental benefits and protect against climate change. A reduction in our dependence on foreign fossil fuels will simultaneously provide positive social, economic and environmental dividends.'

This chapter deals largely with the areas surrounding Renewable Energy as well as Wind Energy policy. Firstly RWE would question Material Alteration No. 137 which sees the omission of text which highlights various targets as set out in the National Renewable Energy Action Plan (NREAP) and the National Energy Efficiency Action Plan (NEEAP). While 2020 has passed, maybe the inclusion of more relevant figures ought to be included. While Material Alteration No. 138 goes on to identify national targets such as:

'to achieve the target of 70% renewable electricity by 2030',

there is a lack of county specific targets for Louth addressed here. This section again goes on to quote and identify figures from the Climate Action Plan 2019 surrounding national targets but fails to identify any specific targets of their own. This kind of weak policy and lack of direct statement and targets surrounding Louths own contributions to Climate Action targets does not support some of the Strategic Objectives which have been highlighted in this submission.

RWE would however like to highlight and applaud Louth County Council on the preparation of the Louth Sustainable Energy Action Plan (LSEAP) which highlights a 10 point plan, with the main objective of sustaining, supporting and creating jobs through developing the concept of Louth as a leader in the delivery of the Green Economy. Policy Objective IU 44 of the LSEAP states that:

'To support international, national and county initiatives for limiting and reducing emissions of greenhouse gases through energy efficiency and the development of renewable energy sources at suitable locations, utilising the natural resources of the County, in an environmentally acceptable manner subject to normal proper planning considerations including in particular the impact on areas of environmental or landscape sensitivity.'

RWE would like to emphasise the importance of the above point and support that this should only be in the case that such development would meet the proper planning considerations of sustainable development at a given location. More importantly the LSEAP Policy Objective IU 47 states it will:

'produce a Renewable Energy Strategy for County Louth during the lifetime of this Development Plan. This strategy shall have regard to 'A Methodology for Local Authority Renewable Energy Strategies', (SEAI) and shall be compliant with the requirements of SEA & Habitats Directive'

RWE commend Louth on the good intentions, and on Material Alteration No. 147 which states the RES will be prepared within 1 year of the adoption of the Revised Wind Energy Guidelines. RWE would request that Louth provide a specific date should the Revised Wind Energy Guidelines continue to be delayed.

RWE want to highlight and commend Louth County Council on the inclusion of Material Alteration No. 140. The insertion of this new section is a good step towards positive contribution to climate action targets nationally but more importantly - locally to Louth itself. Again however, RWE would like Louth County Council to provide specific dates on the production of the RES and within that most importantly of all that specific targets ought to be set out for Louth in terms of their contributions to producing renewable energy.

Material Alteration No. 141 states that:

'A wind energy Strategy will be an intrinsic element of the Renewable Energy Strategy and will be informed by the targets for onshore wind capacity as set out in the Climate Action Plan 2019 (8.2 GW of increased onshore wind capacity), targets which the Council will want to successfully help to achieve.'

Again RWE commend Louth on highlighting the importance of a Wind Energy Strategy as part of a RES but are once more left disappointed by the lack of directly Louth related targets around Renewable Energy and how Louth will contribute towards a reduction in carbon emissions as identified in the Climate Action Plan 2019.

Policy Objective IU 48 of the Draft Louth County Development Plan identifies the importance of a regional approach in identifying areas of potential development for Renewable Energy projects. It states that it will:

‘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 area.’

RWE commend Louth on recognizing the importance of a regional approach in addressing issues surrounding renewable energy developments and climate change as a whole.

Chapter 12: Climate Action

RWE support the inclusion of a new policy objective as per Material Alteration No. 172:

‘To seek to identify projects or initiatives that will assist in meeting national climate and energy targets and to seek funding or support any funding applications for the implementation of these initiatives from available sources including the Department of Communications, Climate Action & Environment’s Climate Action Fund.’