



**WIND ENERGY  
IRELAND**

## Submission on Louth Material Amendments

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# 1 Introduction

## 1.1 Outline of Submission

Wind Energy Ireland (formerly the Irish Wind Energy Association) welcomes the opportunity to make this submission at the Material Amendments Stage of the Draft Louth County Development Plan 2021 – 2027.

Wind Energy Ireland (WEI) have reviewed the Draft Plan and associated Material Amendments. We wish to make specific comment on the following sections:

- Chapter 1: Introduction (Strategic Objectives)
- Chapter 5: Economy and Employment
- Chapter 7: Movement
- Chapter 10: Utilities
- Chapter 12: Climate Action

Our submissions and observations are presented below.

## 1.2 WEI and Wind Energy in Ireland

WEI 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.

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 has just over 300 operational wind farms<sup>1</sup>, which represents an investment of over €7 billion, regularly powering 65% of Ireland's electricity needs. The wind energy industry also supports 5,000 jobs and annually pays more than €45 million in commercial rates to local authorities<sup>2</sup>. We are a country with enormous renewable energy resources and are world leaders at incorporating onshore wind into the national grid.

Renewable energy provided 43 per cent of Ireland's electricity in 2020, with over 38 per cent of this coming from wind energy<sup>3</sup>. This 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. In 2018 wind energy avoided 3.1 million tonnes of CO<sub>2</sub> and cut €432 million off our fuel import bill<sup>4</sup> demonstrating the huge contribution that onshore wind is making to climate action.

Wind energy decarbonises our electricity supply, cuts our energy import bill and drives down wholesale electricity prices. To achieve this, Ireland has built just over 300 onshore wind farms, mostly since 2003, with a combined capacity of approximately 4,300 megawatts (MW) (see Fig. 1 for historical growth of wind) 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. Due to a delay between the end of the REFIT scheme and start of the RESS scheme, only c.135MW was installed during 2020.

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.

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<sup>1</sup> Based on EirGrid generation reference numbers

<sup>2</sup> Economic impact of onshore wind in Ireland - KPMG - <https://windenergyireland.com/images/files/economic-impact-of-onshore-wind-in-ireland.pdf>

<sup>3</sup> <http://www.eirgridgroup.com/newsroom/electricity-consumption-f/index.xml>

<sup>4</sup> <https://www.seai.ie/publications/Energy-in-Ireland-2019-.pdf>

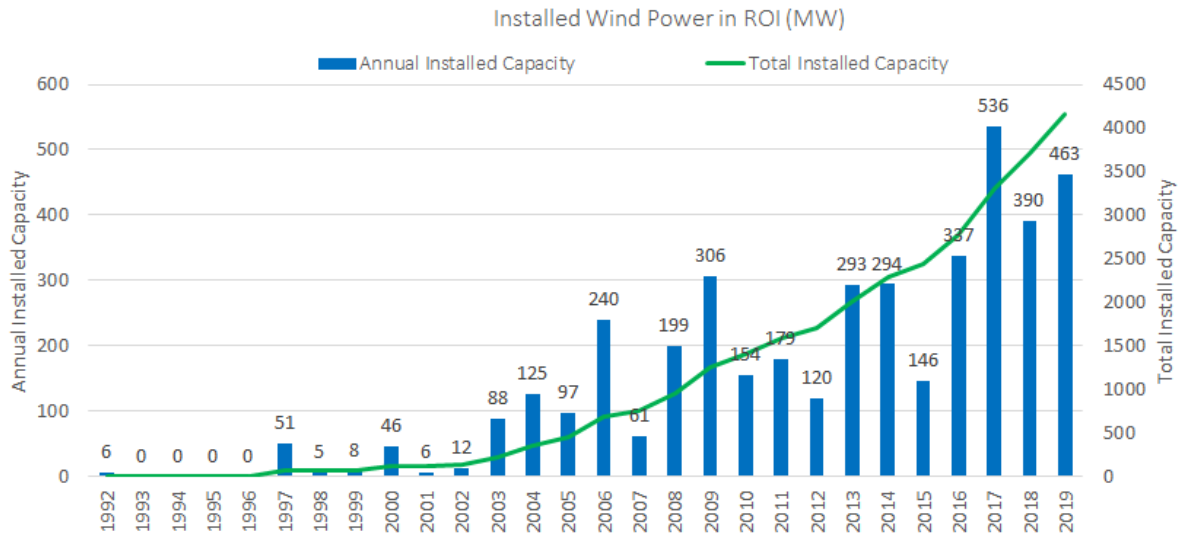


Figure 2: Turbine density in various European Countries

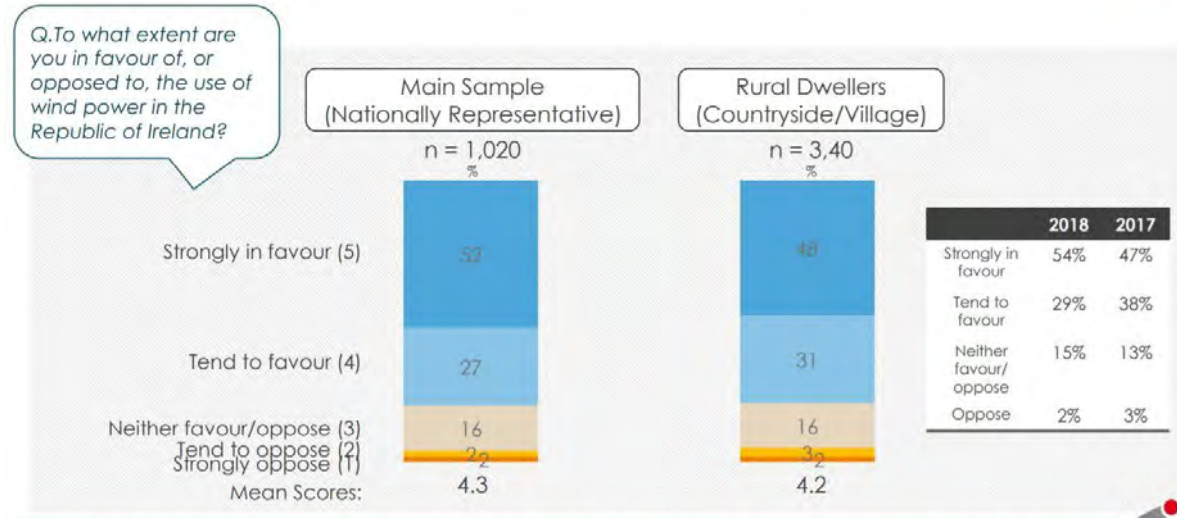
Onshore wind needs to continue growing in Ireland to meet future renewable energy targets with Ireland’s Climate Action Plan proposing an increase from ~4200 MW at the end of 2020 to ~8200MW by 2030. That is why it is critical that the new Draft Louth County Development provides every opportunity to 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 WEI 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<sup>5</sup> (Figure ). The Irish people support clean, renewable, indigenous energy.

<sup>5</sup> ESRI Working Paper 545. October 2016.

# Favourability towards Wind Power



Consistent with previous waves, 4 in 5 Irish of those surveyed are in favour of wind power in Ireland.

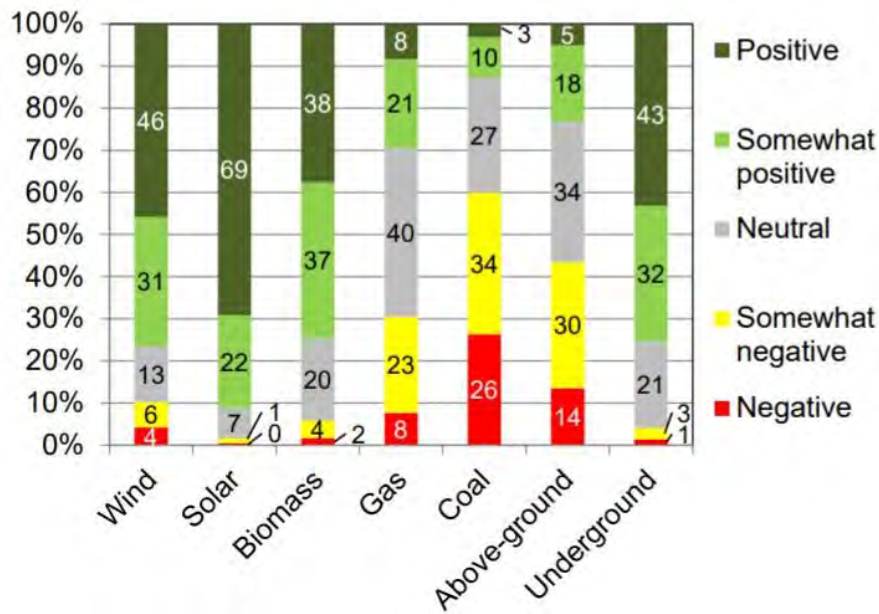


Figure 4: Irish Residents Views of Energy-Related Technologies (Bertsch et al., ESRI, Journal of Energy Policy 2017<sup>6</sup>)

<sup>6</sup> <http://dx.doi.org/10.1016/j.enpol.2017.04.008>

## 2 Chapter 1: Introduction (Strategic Objections)

WEI support Louth County Council's Strategic Objective No.4 (& Material Alteration No.7) :

*'Transition to a low carbon and climate resilient County supporting energy efficiency and reducing energy demand, through a combination of mitigation and adaptation responses to climate change. This includes for increased usage of renewable energy through developing indigenous energy resources, supporting the transition to a low carbon economy by 2050, and ensuring flood risk management. The Council will work with other bodies and organisations as appropriate, to identify and help protect critical infrastructure.'*

As well as the above-mentioned Strategic Objective (SO) WEI would also like to highlight and commend Louth County Council on the inclusion of SO No. 5 and SO No. 14.

**SO No. 5** *'Ensure a more sustainable and integrated concept of development with regard to land use, transportation, water services, energy supply and waste management over the lifetime of the Plan.'*

**SO No. 14** *'Reverse rural decline in small towns and villages through sustainable, targeted measures addressing vacancy and delivering sustainable reuse and regeneration outcomes.'*

Ensuring a more integrated concept in terms of development to include energy supply as part of how development in County Louth will be viewed going forward is courageous and ought to be commended. As well as this as highlighted previously in this submission Renewable Energy developments can bring significant economic benefits to a rural economy. Thus highlighting the importance of delivering sustainable reuse and regeneration outcomes to reverse rural decline, is an important element to be being considered for this draft plan.

### 3 Chapter 5: Economy and Employment

WEI 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.

WEI 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 Louth's 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.

## 4 Chapter 10: Utilities

WEI 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 WEI 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 Louth’s own contributions to Climate Action targets does not support some of the Strategic Objectives which have been highlighted in this submission.

WEI 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.’*

WEI 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’*

WEI 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. WEI would request that Louth provide a specific date should the Revised Wind Energy Guidelines continue to be delayed.

WEI 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, WEI 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, WEI 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.’*

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

## 5 Chapter 12: Climate Action

WEI 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.'*

## 6 Regional Approach

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

WEI 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. WEI 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 WEI 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. WEI 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, WEI 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 & Midlands Regional Assembly's RSES was adopted on 28<sup>th</sup> June 2019 and includes the following objective:
  - *"RPO 7.35 Decarbonising the Energy Sector*
  - *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 (DCCA), WEI- 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.

**ENDS**