

Draft Clare County Development Plan 2023-2029,  
Planning Department,  
Clare County Council,  
New Road,  
Ennis,  
Co. Clare V95 DXP2

By email to: [devplan@clarecoco.ie](mailto:devplan@clarecoco.ie)

23 March 2022

Dear Sir/Madam,

**Re: Submission to Draft Clare County Development Plan 2023-2029**

Thank you for providing an opportunity to consult on the above matter. This submission is made on behalf of FuturEnergy Ireland.

FuturEnergy Ireland (FEI) is the recently launched joint venture company owned on a 50:50 basis by Coillte and ESB. This collaboration combines the State's strongest assets and expertise in onshore renewable energy development on behalf of the people of Ireland. We are one of the largest dedicated developers of onshore wind in Ireland and our mission is to maximise the potential of our national resources and accelerate Ireland's transformation to a low carbon energy economy.

**Importance of On-Shore Wind**

The Climate Action Plan (CAP) 2021 requires 80% of our electricity to come from renewable sources by 2030 comprising up to 8,000MW of onshore wind, approximately doubling what is being produced today. FEI is currently targeting the delivery of 1,000 MW of new onshore wind projects in this period, largely enabled by Coillte lands across Ireland.

Given the relatively high likelihood that a significant portion of new offshore capacity will only start to be delivered onto the system post 2027 and with a regulatory framework yet to be formally established and become operational, there is real potential that volumes may fall short of the targets set out in the National Energy Climate Plan 2021<sup>1</sup>, increasing reliance on onshore wind.

The criticality of onshore wind in Ireland's energy mix is further apparent when the near-term trajectories in the Clean Energy Package Governance Regulation are considered. This states that Member countries must set a trajectory for their total 2030 share of energy from renewable sources at 18%, 43% and 65% in 2022, 2025, 2027 respectively.

There is a strong policy signal that renewable energy ambition levels will continue to increase over the course of the decade, as evidenced by the recent increase in our national target from 70% to 80% late last year, and that onshore wind energy will continue to have the vital leading role that it has in the CAP 2021. Furthermore, in early March 2022 the European Commission made an announcement

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<sup>1</sup> <https://www.gov.ie/en/publication/0015c-irelands-national-energy-climate-plan-2021-2030>

addressing energy security issues emerging from Russia’s invasion of Ukraine<sup>2</sup>. It revealed that the EU intends to drastically accelerate its transition to clean energy thereby increasing Europe’s energy independence and “will publish a recommendation on fast permitting for renewable energy projects and will work to support the use of all flexibilities already granted by EU legislation and the removal of remaining obstacles, whatever their origin” (page 9). In addition, member states will be required to swiftly map, assess and ensure suitable land and sea areas are available for renewable energy projects, commensurate with their national energy and climate plans.

It is wholly apparent from national and EU policies, and based on current trajectories, that onshore wind is a critical form of infrastructure which is essential to address our climate and energy security crises.

### **Draft Plan Observations: Wind Energy Strategy**

We welcome the inclusion of a renewable energy strategy (RES) in the Draft Plan. We note the existing Clare Wind Energy Strategy (WES) is being carried forward and that the planning authority has committed to reviewing it once the new National Wind Energy Guidelines are issued. Notwithstanding this commitment, or indeed in light of it, we request a corresponding clear policy objective is added to the Draft Plan to ensure this is forthcoming.

We recognize that the current WES is a formative and well construed strategy that has proved effective over time. Importantly we recognize that the strategy complies with the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, (Dept. of Housing, Planning, Community and Local Government) July 2017*, as, amongst other things it indicates that the onshore wind energy potential of the strategy is 550MW (RES Table 4.3).

This onshore target was set some time ago and has largely been obtained according to Table 4.4 of the RES which states 152.8MW has been installed and Table 4.5 which states 347.17MW<sup>3</sup> has been permitted. However, we note and welcome objective RES 4.1 which states it is an objective of the County Council to facilitate the achievement of (or to exceed where possible) the renewable energy targets set out in Table 4.3 by 2030 (ie. 550MW onshore wind). We further note that the 550MW is stated as a minimum target in the current WES, Section 3.1, Appendix 6.

We believe, based on 550MW being a minimum target, that the current WES can continue to facilitate onshore wind successfully in the County.

### **Draft Plan Observations: Energy Storage**

We welcome the inclusion of section 15 of the RES relating to Energy Storage. We firmly believe that energy storage technology is critical to ensuring our energy future. We concur with statements in the RES that the overall requirements, types of storage and ideal location for all technology types is not understood fully at this point. For this reason, we welcome objective RES 15.1, which seeks to facilitate where possible, forms of energy storage that improve overall electricity grid resilience and stability.

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<sup>2</sup> COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE EUROPEAN COUNCIL, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS REPowerEU: Joint European Action for more affordable, secure and sustainable energy. [Strasbourg, 8.3.2022 COM(2022) 108 final]

<sup>3</sup> There appears to be a discrepancy in the RES which states 347MW of onshore wind is permitted in Table 4.5 and 225.6MW in Map 4.2.

We also welcome objective RES 15.3 which proposes to examine in planning applications how energy storage systems such as batteries will be safely managed and recycled at the end of life phase to ensure a circular economy approach to design and resource efficiency.

### **Draft Plan Observations: Community and Economic Development**

As the Council is aware, the Energy Sector is a key sector for job growth throughout the lifetime of the Draft Plan. Wind energy developments can generate significant construction and operation jobs throughout its lifetime and significantly contribute to rural regeneration through the provision of local community benefit funds and local authority rates contributions.

In relation to communities, FuturEnergy Ireland operate a ‘Fair Play Model’ of engagement that commits to transparent dialogue and the sharing of information on an on-going basis with those most impacted by proposed developments. This model places greatest focus on the residents of dwellings within 2km of any development area and recognises the need to ensure people located further away from the development are informed as details become more defined.

FuturEnergy Ireland is also committed to ensuring that local communities benefit from having a wind farm in their locality in terms of a Community Benefit Fund that supports the development of local recreation amenities and provides additional community project funding. Community benefit schemes relating to RESS projects will have significant community benefit and provide an opportunity to transform rural communities where projects are located. A good example includes recreational facilities at Sliabh Bawn Wind Farm in Co. Roscommon ([www.sliabhawnwindfarm.ie](http://www.sliabhawnwindfarm.ie)).

The Public Consultation on Good Practice Principles for Community Benefit Funds<sup>4</sup>, under the third Renewable Energy Support Scheme (RESS3) published 30th March 2021, provided welcome guidance on Community Benefit Fund administration, structure and quantity, indicating that a 50MW project will provide approximately €300,000 to the local community annually.

FuturEnergy Ireland is an active member of the Wind Energy Ireland (WEI, formerly IWEA) and our team members actively participate in several of the Association’s committees and the Board of the organisation. WEI statistics confirm that in terms of initial capital investment, every megawatt (MW) of wind energy capacity installed gives rise to an investment of approximately €1.25 million. Ongoing investment and economic development benefits during the 30-year plus operational lifespan of wind farms take the form of rents payable to landowners, financial support for local communities in the form of community benefit schemes and commercial rates payable to local authorities. Combined, these amount to approximately €25,000 per MW per annum.

We are also working hard around Community Investment and examining how communities could be given the opportunity to invest in a wind farm project.

In summary, FuturEnergy Ireland believes that wind energy is of strategic importance to the county in addressing climate change, growing the Clare economy and providing employment opportunities in both rural and urban communities.

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<sup>4</sup> DoECC, 2021 “Community Benefit Funds – Good Practice Principles Handbook”

<https://www.gov.ie/en/consultation/995be-public-consultation-on-good-practice-principles-for-community-benefit-funds-under-the-renewable-electricity-support-scheme/> 12 | Page

FuturEnergy Ireland is therefore supportive of objective RES18.3 which encourages developers of proposed large-scale renewable energy projects to carry out community consultation in accordance with best practice and to start the consultation at the commencement of project planning.

### **Working in Partnership on Wind Projects**

The scale of the overall Climate Action Plan ambition is substantial and requires considerable collaboration between all parties involved or associated with renewable energy including the communities that will ultimately host the infrastructure. FEI has an experienced team in wind farm planning and development and is available to work in partnership with Clare County Council to support the realisation of the Climate Action Plan targets.

### **Conclusion**

It is critical that we increase our renewable energy fleet and remove fossil fuels from our society. Onshore wind is critical to meeting targets in our Climate Action Plan 2021 as well as our interim national targets between now and 2030.

We thank you for the opportunity to provide feedback on the Draft Plan through the current consultation process. We would be happy to participate in any further engagement on this matter, including to discuss any aspect of our response, or to clarify any matters arising, should that be of assistance.

Yours sincerely,

[sent by email]

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