



Attn: Planning Department

Clare County Council
 Áras Contae an Chláir
 New Road
 Ennis Co. Clare
 V95 DXP2

Our Ref: 220110

By Email: devplan@clarecoco.ie

25th March 2022

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

Dear Sir/Madam

On behalf of our client, Ørsted, we wish to make a formal submission to the Stage Two (Draft) consultation of the Clare County Development Plan 2023-2029 (DCCDP) (hereinafter referred to as the Draft Plan). Our client welcomes the opportunity to engage with the Development Plan review process. This submission relates to renewable energy, specifically matters relating to designation of areas for wind energy generation, the matter of repowering of wind farm sites, and concerns that the Wind Energy Strategy (WES) of the adopted Plan has not been reviewed as part of this Development Plan review process.

General Comments

While being cognisant that the premise for not reviewing the Wind Energy Strategy (WES) of the Development Plan is based on Circular PL 20-13, that Circular was issued in 2013 on the basis of the 2006 Wind Energy Guidelines being under review; a review which has still not concluded. Given this fact, and the fact that it is well known within the industry that the revision to the Guidelines remains a matter of debate, it appears short-sighted for the Council not to conduct some form of review of the WES at this stage in order to present a more robust and complete Draft Plan as possible. The Development Plan review process provides an opportunity for the Planning Authority to ensure the correct policy framework is in place to facilitate continued generation of wind energy as part of the renewable energy mix, and to ensure repowering is fully recognised over the Plan period as an important means by which to assist in meeting renewable energy targets.

Although the WES was not revised as part of the Draft Plan, it is important that Clare County Council begin identifying opportunities to improve the identification and application of strategic wind energy designations for the next 6 years. As climate change is now a clearly acknowledged emergency in Ireland, the establishment of low carbon economies through increased efficiency of renewable energy generation is a time-critical consideration which should underpin the County Development Plan review.



The Draft Plan acknowledges that *“there is significant potential for the development of renewable energy in County Clare. The County has one of the best wind resources in the world – almost the entire County has either an excellent or very good wind energy resource.”* One of the key priorities for the Draft Plan, given the wind resource in County Clare, should therefore be to ensure a robust policy framework exists to guide future wind energy development.

The Council are reminded of the importance, as set out in Project Ireland 2040 National Planning Framework (NPF), for Ireland to reduce gas emissions from the energy sector by at least 80% by 2050. This in part can be achieved through the proper designations of areas suitable for wind energy development across the country. At regional level, a range of policies relating to wind energy development been included in the Regional Spatial and Economic Strategy (RSES) for the Southern Region which the emerging Plan is required to align with including RPO 95- Sustainable Renewable Energy Generation which aims to *“leverage the Region as leader and innovator in sustainable renewable energy generation.”* The RSES is also forward looking in its Objectives, acknowledging that as the Region grows there is an onus on the Region to be able to meet demand (RPO 96- Integrating Renewable Energy Sources). Furthermore, RPO 221 – Renewable Energy Generation and Transmission Network states that *“Local Authority City and County Development Plans shall support the sustainable development of renewable energy generation...”* and concludes at criterion c that *“The RSES supports the Southern Region as a Carbon Neutral Energy Region.”* There is a clear policy focus at regional level to capitalise on both identified and emerging opportunities associated with the transition to a decarbonised economy such as renewable energy generation.

Draft Development Plan – Written Statement

It is welcomed to see within the main body of the Draft Plan the inclusion of onshore wind as a renewable energy resource, with a target of 550MW for the county to 2030. Associated Development Plan Objective CDP2.1 is welcomed.

Renewable energy is addressed at section 8.3.4 of Chapter 8 of the Draft Plan, noting that the county *“has one of the best wind resources in the world – almost the entire county has either an excellent or very good wind resource.”* This clear confirmation of the ongoing attractiveness of the county for continued deployment of wind energy is welcomed. The section refers to areas suitable for commercial wind energy developments being set out in Volume 6 of the Plan, which relates to the WES. This reference should be altered to address the fact that Volume 6 of the Draft Plan has not been updated as part of this Plan review, and it should be explicitly referenced in the text of the Plan to clarify that the WES is due to be updated following receipt of the finalised WEGs. It is therefore requested that section 8.3.4 of the Draft Plan is updated as follows:

*“Areas that are considered suitable for commercial wind energy developments are set out in Volume 6 of this Plan **which will remain in force until 2027, or an earlier date should the Wind Energy Guidelines be finalised and adopted at which stage Volume 6 will be revisited.**”*

This requires to be reflected also in Development Plan Objective: Renewable Energy Development CDP 8.12.



Section 11.8.3 Electricity Networks of the Draft Plan identifies *that “a strong transmission grid is essential to attract and retain high-tech investment; to ensure competitive energy supplies; to achieve competitive energy supplies; to achieve balanced development; to reduce dependency on fossil fuels; and to achieve climate change targets.”* This is welcomed. The ongoing close working relationship between the Council and EirGrid to help achieve same is also welcomed.

Section 11.8.5 Renewable Energy Sources

Reference in this section to the WES being reviewed on publication of the update to the 2006 WEGs requires to be amended to read *“upon **the adoption of the update to the Wind Energy Guidelines for Planning Authorities 2006. Until that time, the existing WES included here at Volume 5 will be utilised in considering wind energy development proposals.**”*

The specific note regarding the update to the WES at Development Plan Objective : Renewable Energy CDP 11.47 (d) is welcomed.

The note of support for the development of a Regional Renewable Energy Strategy per Development Plan Objective: Renewable Energy Strategy CDP 11.48 is welcomed.

The Draft Plan references that County Clare has a dependency of 65% on imported energy which requires to be reduced by using indigenous low carbon energy resources. This can be achieved and expedited using wind energy development which is the most established and efficient renewable energy source. This will further eliminate the dependence on *“external forces governing the supply and cost of energy needs”* for the County.

Renewable Energy Strategy - Volume 5

In respect of the Renewable Energy Strategy (RES) included at Volume 5 of the Draft Plan, it is welcomed that the 2030 targets set out (refer to Table 1.1) are not to be viewed as caps or limitations. The provisions of Objective RES 3.1: Meeting the County’s energy needs from 100% renewables is also welcomed.

The RES discusses an ‘unconstrained’ approach to renewable energy resources and under such scenario (refer Table 4.1) attributes a target of 4,761.6 MW to onshore wind. A ‘constrained’ approach, modifying the contents of Table 4.3 of the RES, reduces the onshore wind target to 550MW, allowing for other considerations including environmental, grid connection availability, community impact etc.

Chapter 6 of the RES relates specifically to onshore wind, summarising the key objectives of the WES. It is requested that, for complete clarity, section 6.1 of the Chapter is amended to note that the WES is to be updated following adoption of the WEGs.

Repowering

It is of note that section 6.5 of the RES is the only part of the Draft Plan that refers to repowering potential for wind farm sites in the Draft Plan. It is held that repowering will soon be an inherent part of the renewable energy mix and going forward, with many wind energy developments reaching the end of their operational life, requires a solid policy framework to guide future planning applications.



It is held that repower areas must form part of the emerging WES for the county and a policy framework be put in place to guide future applications on such lands whilst acknowledging the fact that the principle of wind energy in the areas is previously established. It is held that in the absence of an updated WES the Plan should provide additional narrative around the benefits of repowering at this stage. There is a need for clarity regarding the policies and approach to repowering that will be contained within the reviewed WES for prospective applicants. We would highlight to the Council the warning point issued in IWEA's More Power to You: A Guide to Repowering in Ireland (2019) which noted:

“To reach its 70 per cent renewable electricity target by 2030, Ireland cannot afford to needlessly lose capacity through avoidable decommissioning or have a large percentage of the fleet operating inefficiently because of a lack of Government policy to support repowering. Repowering can be a key enabler for Ireland reaching its 2030 targets by increasing our renewable energy production, and it has a host of associated benefits.”

At this stage we would welcome guidance in the emerging Plan as to the repowering policy and the approach to repowering which the Council will be taking.

Conclusion

In conclusion the general support offered in the Draft Plan for the continued deployment of renewable energy developments within the county, and the recognition that Clare has significant potential in respect of wind energy, is welcomed. It is critical that Clare County Council should identify sites of strategic regional and national importance that have the potential to accommodate wind energy development to meet renewable energy targets. Related to same is the need for Clare County Council to consider a revision to the WES prior to the adoption of the Wind Energy Guidelines given the passage of time since the Circular, which the Council have relied upon in not conducting such a revision at this juncture in the Plan process, was issued. The Plan review process provides a key opportunity for the Council to ensure the correct policy framework is also put in place for repowering of sites, which is a process which will come into sharp focus very soon. It is crucial that the WES once reviewed acknowledges the benefits of repowering wind farm sites and aligns with the Written Statement of the Plan in this regard. In meeting the challenge of transitioning to a low carbon economy decisive action is required at all levels of governance. As climate change is now a clearly acknowledged emergency in Ireland, the establishment of a low carbon economies through increased efficiency of renewable energy generation is a time-critical consideration underpinning the Development Plan review process.

It is therefore respectfully requested that Clare County Council take on board the matters raised in this submission on behalf of our client.

Yours sincerely

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