

Planning Department,
Leitrim County Council,
Áras an Chonate,
St. George's Terrace,
Carrick-on-Shannon,
Co. Leitrim, N41 PF67

By email to: cdp@leitrimcoco.ie

26th April 2022

Dear Sir/Madam,

Re: Draft Leitrim 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.

1 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. Leading projects within our portfolio are located within County Leitrim.

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 2021¹, 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

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

addressing energy security issues emerging from Russia’s invasion of Ukraine². 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.

2 Draft Plan Observations

2.1 Chapter 12 and Appendix IX Part A– Renewable Energy Strategy

We welcome the preparation of a Renewable Energy Strategy as part of the Draft Plan and the compliance of the RES with the requirements of the ‘Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change’ (July 2017).

The Renewable Energy Strategy (RES) is clear and well-constructed; however, we have the following concerns with Step 1 as described in Section 6.1.5 of the document:

- Turbine technologies have advanced significantly in the past decade and this trend is set to continue. This will continue to enable new areas with lower wind speeds to be considered for potential development. We therefore believe wind speed should not be a constraint in Step 1 when identifying suitable areas for on-shore wind³.
- It is unclear how the available areas in Figure 6.3 have been arrived at. Constraints used to inform their identification are described as those “... posed by features such as EU and Ramsar protected sites (also including waterbodies), heritage and monuments, settlements and existing infrastructure / material assessed as discussed in Section 3” (RES, pg . 37). Section 3 however, is not prescriptive in relation to how these constraints have been applied. For example, Cultural heritage (Section 3.8.4) states that:

“The aim is to harness the renewable energy potential of the area while preserving the architectural and archaeological heritage.”

It does not explain what sites are considered constraints, or what buffers are appropriate or necessary. Similarly in Section 3.8.1, Biodiversity, it is concluded that:

“the potential impact ... on these areas should be assessed and mitigation measures put in place where necessary. Where measures cannot be implemented to eliminate or significantly reduces impacts, development should consider alternative siting.”

² Communication from the Commission to the European Parliament to 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]

³ Point raised in Coillte RE submission on the Issues Paper.

While the protected areas are outlined in Figure 3-2, it is unclear if there is a buffer applied or how these relate to the ‘available areas’ in Figure 6.3. Indeed, it would appear that some biodiversity areas and ‘available areas’ overlap.

A high-level assessment of the available areas in Figure 6.3 indicates that there may be potential for turbines on the peripheries of the ‘available areas’ and near the boundaries. It is very important therefore and based on the issues identified above, that the boundaries of the ‘available areas; are understood to be indicative only. We request the text in the RES is updated to clarify this point as follows:

*Pg. 37 para 1: “Figure 6-3 shows those areas in dark blue that are available, taking into account constraints posed by features such as European and Ramsar protected sites (also including waterbodies), heritage and monuments, settlements and existing infrastructure/ material assets, as discussed in Section 3. The findings presented in Figure 6-3 also take into account a setback distance of 500m from all sensitive receptors consistent with the Wind Energy Guidelines of 2006 and the draft 2019 WEDGs. This figure also illustrates the proximity of the available areas to the transmission network and therefore possible grid connections. **Given the less detailed nature of the mapping exercise and the findings presented in Figure 6-3, it is possible that developments may suitably propose turbines in the adjoining areas. Such opportunities arising from a more detailed constraints analysis of available areas is consistent with this strategy.**”*

On a separate matter we note the strategy does not classify/tier lands in the county for on-shore wind development. For this reason, we do not see the need for the RES to state that there are no areas where new wind turbines would be considered ‘acceptable in principle’ (pg. 39, potential wind resource summary). As per policy WE POL 3, all wind energy developments will have regard to environmental sensitivities and will be thus assessed in accordance with the principles of proper planning and sustainable development. We request this statement in the RES is deleted.

2.2 Chapter 12 and Appendix IX Part B– Landscape and Visual Capacity Study for Wind Farms and Wind Turbines

We note the findings of the Landscape and Visual Capacity Study for Wind Farms and Wind Turbines in Part B and we welcome the conclusion that sites will be assessed on their own merits as follows:

“although scope for future wind energy development would be limited, each planning application for proposed development of this kind would have to be judged individually on its own merits with reference to a landscape and visual impact assessment (LVIA) report undertaken in line with current good practice guidance by an appropriately qualified landscape architect...”

We also welcome the acknowledgement in the Landscape and Visual Capacity Study:

‘that areas of upland moorland where rolling landform and consistency of landcover could be deemed worthy of further assessment to ascertain capacity to accommodate a limited number of wind turbines and that such areas may also comprise altered landscapes due to man-made influences such as commercial forestry’.

We believe this is an important acknowledgement that will enable Leitrim to leverage its onshore wind capacity in the ‘available areas’.

2.3 Chapter 9 & 12: Energy Networks Infrastructure and Energy Storage

We concur with the Council that an adequate and reliable electricity and gas supply/infrastructure is essential if the County is to develop and compete nationally for investment. Climate Action Plan 21 plays a central role setting the investment signals for climate action delivery to 2030 with an emphasis placed on ensuring the development and delivery of the necessary key enabling infrastructure. We welcome the commitment in the Draft Plan to advocating and facilitating the extension, including new build and the consolidation of critical electricity and gas networks in the County.

In particular, we welcome ENI POL 3 & 4. The former supports the renewal, reinforcement and strengthening of the electricity transmission network and EirGrid's Renewable Integration Development Project, that traverses Leitrim, Sligo and Donegal. The latter supports transmission network requirements to integrate linkages with renewable energy proposals in a sustainable and timely manner.

In addition, new and innovative forms of energy storage and grid stability services are continuously evolving to support EirGrid with the integration of the targeted higher levels of renewable electricity on the system. Global advancements in this area are continuing at pace however, the overall requirements, types of grid service and storage and preferred locations is yet to be fully determined. For this reason, we welcome the inclusion of policy ES POL 1 in Section 12.6.8, which generally promotes the use of efficient energy storage systems and infrastructure that support energy efficiency and reusable energy system optimisation, subject to compliance with proper planning and environmental considerations.

3.0 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).

The Public Consultation on Good Practice Principles for Community Benefit Funds⁴, 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 Leitrim economy and providing employment opportunities in both rural and urban communities.

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 Leitrim County Council to support the realisation of the Climate Action Plan targets.

4 Conclusion

It is critical that we increase our renewable energy fleet and remove fossil fuels from our society. The further delivery of onshore wind and the enabling electricity grid infrastructure is critical to meeting targets in our Climate Action Plan 2021 as well as our interim national targets between now and 2030.

Our key asks are:

Amend text on page 37, para1 of the RES and
Amend text on page 39 of the RES.

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]

⁴ DoECC, 2021 "Community Benefit Funds – Good Practice Principles Handbook"

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

Directors: Barry Gavin (Chair), Henry Bouchier, David Feeney, David McNamara, Gerard Murphy, William Stanley, William Young. **Company Registration Number:** 683948

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