



Planning Department  
Leitrim County Council  
Áras an Chontae,  
St. Georges Terrace,  
Carrick on Shannon  
Co. Leitrim N41PF67

**Our Ref:** 200736

12 August 2020

**Re: EDF Renewables - Submission on Leitrim County Development Plan 2022-2028: Strategic Issues Paper**

Dear Sir/Madam,

On behalf of our client, EDF Renewables, MKO wish to make the following submission on Leitrim County Council's Public Consultation Strategic Issues Paper. EDF Renewables is a major utility and renewable energy developer with a wide range of experience within both Ireland and across the globe. As of June 30<sup>th</sup> 2020, EDF Renewables has installed a gross capacity of 13,287 MW of renewable energy worldwide. This submission will have specific reference to how the future Leitrim County Development Plan (CDP) 2022-2028 can address the impacts of climate change, and in doing so, support the provision of renewable energy as part of a wider strategic solution.

As the country realigns its focus to the upcoming EU 2030 climate and renewable energy targets under EU Directive 2009/28/EC, the preparation of a new CDP provides an opportunity to reevaluate Co. Leitrim's role in supporting overarching national goals and objectives. Based on Co. Leitrim's historic and on-going success in proactively managing the challenges arising from both regional and local environmental and climatic changes, we believe that the Council can use this progress as a springboard to set more ambitious policies and objectives within the next iteration of the CDP.

As it is now acknowledged that Ireland will likely miss its binding 2020 targets, the urgency to continue decarbonisation of the energy network in order to meet future 2030 and 2050 targets has become clearer to all stakeholders. As noted above, the 2030 Climate and Energy Framework signifies the next overarching benchmark for EU renewable energy policy. In this context, the Strategic Issues Paper has already highlighted the importance of this consideration under Section 13 (Climate Change and Adaptation), noting that '*Climate change will be a cross cutting theme in the new County Development Plan*'. Under National Policy Objective 54, the National Planning Framework sets out the requirement to,

*"Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions."*

As the CDP will be the key link between national climate change targets and objectives and implementation at a localised planning level, we would suggest that the vision for the Leitrim County Development Plan 2022-2028 explicitly cites the 'proactive management of climatic changes' in order to set a positive precedence for the CDP's approach to balanced and sustainable development and land use.



The Strategic Issues Paper differentiates between ‘Mitigation’ and ‘Adaptation’ approaches under the umbrella heading of Climate Action. In the context of Mitigation, the Paper states the following,

*“Mitigation refers to efforts that will reduce current and future greenhouse gas emissions including reductions in energy use, switching to renewable energy sources and carbon sinks.”*

In order to contextualise this approach within the broader national strategy, it is considered pertinent to consider the Climate Action Plan 2019 (CAP) in the absence of the recently set-aside National Mitigation Plan. The CAP unequivocally states that current policy frameworks will not achieve the required step-change in Ireland’s emissions performance over the coming decade to ensure EU targets for 2030 are met. In order to meet these future targets, the CAP states that the electricity sector will have to establish a 70% share of renewable electricity by 2030. This will require increasing renewable electricity generation, reinforcing the existing grid network and putting systems in place to manage intermittent sources of power. Specifically, the CAP identifies a need to deliver up to 8.2GW total of onshore wind capacity to meet the proposed 70% target. In this regard, the extant Leitrim CDP 2015-2021 is already forward-facing with regard to acknowledging the importance of renewable energy as part of climate mitigation action (e.g. Policy 135), particularly wind energy as reflected below,

*“The Council recognises the potential of the County for generating electricity by means of windfarms and is favourably disposed towards their development subject to the protection of the environment and visual amenity (Page 198)*

*The Council acknowledges the role of wind energy in; reducing the reliance on non-renewable sources of energy, reducing the dependency on important fuels and in moving towards a ‘low carbon’ society (Page 199)”*

According to the Irish Wind Energy Association’s Annual Report (March 2020), there is 4.2GW of installed wind capacity in Ireland as of 2019. Against this backdrop, it will be critical for the Council to maintain this progressive outlook on wind energy infrastructure and, where appropriate, refine current standards and assumptions regarding renewable energy within the Leitrim County Development Plan 2022-2028 and forthcoming Renewable Energy Strategy in order to contribute to the delivery of 8.2GW onshore wind capacity.

As the more easily identified sites for wind energy infrastructure across the country have now broadly been developed, Planning Authorities, Developers and Local Communities must now challenge themselves to reconsider how we balance the necessity of renewable energy generation with protecting the value and amenity of the natural environment in the context of the requirements of proper planning and sustainable development. Although there is no clear solution to this question and bespoke solutions will be required in terms of project design, location and operations, we support the Council’s decision to prepare a Renewable Energy Strategy (RES) as part of the future CDP which should assist in unlocking new viable sites for renewable energy infrastructure. In preparing the RES, we would suggest that the *Landscape Assessment of County Leitrim* (November 2002) is also re-evaluated in order to ensure that landscapes are accurately assessed against the last 18 no. years of development within the county, particularly Areas of High Visual Amenity (HVA), Areas of Outstanding Natural Beauty (AONBs) and Outstanding Views and Prospects. As noted within the extant CDP 2015-2021,

*“The capacity to absorb development varies greatly from AONB/HVA to AONB/HVA and even within AONB/HVAs. The most beautiful landscape is not always the most vulnerable to change.”*

Specifically, we believe that there is significant potential within Co. Leitrim’s upland/moorland landscapes to accommodate wind energy infrastructure without resulting in significant adverse effects on the receiving landscape.

Any future Renewable Energy Strategy (RES) is likely to apply a range of designations in relation to wind energy e.g. Strategic Areas, Acceptable in Principle Areas, Open to Consideration Areas, and/or areas



which are deemed unsuitable. Such strategies predominantly follow the application of a strategic level “sieve analysis”, which potentially exclude large areas within a county from consideration for wind energy. While we absolutely support the provision of a RES for Leitrim, we request that blanket exclusion of areas from consideration at a strategic level be carefully considered by the Planning Authority. Designating large areas as being unsuitable due to the application of broad-brush strategic level constraints can severely limit the site selection process, reduce the ability to meet national targets and can also artificially restrict highly suitable sites from being brought forward. The Environmental Impact Assessment and Appropriate Assessment processes have proven effective and robust in demonstrating that sites at a project level are in accordance with the principles of proper planning and sustainable development while ensuring significant environmental effects are avoided.

As evidenced in the recent decision in relation to the Tullynamoyle Wind Farm Stage 5 Extension for 4 no. additional wind turbines (PI Ref. 19/26) within the O’Donnell’s Rock and Boleybrack AONB, wind energy infrastructure can be accommodated within an AONB, subject to robust landscape and visual impact assessments and appropriate individual project design and siting carried out as part of the Environmental Impact Assessment process. Accordingly, we request that the Planning Authority do not apply a blanket unfavourable designation within its RES in relation to areas designated as AONB/HVA, or alternatively, apply a similar designation to areas which are considered to have “low” wind speeds. In relation to wind speeds, turbine technology has evolved and moved to ensure that this is not a significant issue and site monitoring can provide more detailed and accurate site specific wind modelling.

In relation to AONB/HVA landscape designations, there is an opportunity within such areas to define possible designations (e.g. *Strategic, Acceptable in Principle, Open for Consideration*) in the forthcoming RES to ensure that any future proposals must be subject to detailed visual assessment as part of the EIA process. In this regard, for example, locations within and adjacent to such sites as Benbo (Benbo AONB), Ballaghbehy Top (O’Donnell’s Rock and Boleybrack AONB) and Leean Mountain and Keelogyboy Mountain Far East (The Doons, Lough Gill and Environs AONB), may prove to be appropriate for the provision of wind energy infrastructure, subject to further detailed site specific analysis and project design.

Although designated as sensitive landscapes, these AONBs are recognised as having good wind resources and are located in sparsely populated areas which are considered inherently less constrained with regard to potential noise, shadow flicker, amenity, health and safety impacts and best practice guidance (e.g. setback distances) set out in the Wind Energy Development Guidelines (2006) and Draft Revised Wind Energy Development Guidelines (2019). Furthermore, such sites have all experienced managed development since 2002, both within the sites themselves and along their peripheries, which indicates that these landscapes can accommodate carefully managed development. While we acknowledge that landscape considerations are not in themselves the only matters to be considered when assessing the suitability of a site, the re-evaluation of landscape merits (e.g. Sensitivity to Change, Landscape Condition and Human Influence) is an important first step when identifying potentially new viable sites within these AONB/HVAs.

In conclusion, EDF Renewables respectfully requests Leitrim County Council to set an ambitious climate action and renewable energy policy framework within the Leitrim County Development Plan (CDP) 2022-2028 in line with the Climate Action Plan 2019 and the National Planning Framework. Underpinning this framework, we suggest that the forthcoming Renewable Energy Strategy critically evaluates existing assumptions associated with previously identified AONB/HVAs in order to strike a balance between protecting Co. Leitrim’s natural amenity and ensuring the most appropriate renewable energy sites can be brought forward in order to contribute to our national goals and objectives. In this regard, we request that, in the preparation of the upcoming RES, the Planning Authority carefully consider any areas which they may deem to be unfavourable for wind energy development. The broad application of wide ranging strategic exclusion areas may restrict the ability of a renewable energy project to bring



forward an appropriate design, and suite of mitigation measures at a project level, which would satisfactorily respond to any site specific nuances through the EIA process.

EDF would like to thank Leitrim County Council for this opportunity to engage with the plan preparation process.

Yours faithfully,



---

Jordan Baxter, B.A., MSc  
Planner  
JBaxter@mkoireland.ie

