



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

Email: office@WindEnergyIreland.com

27th April 2022

Dear Sir/Madam,

Re: Material Alterations to Draft Leitrim CDP 2023-2029

Introduction

Wind Energy Ireland (WEI) (formerly Irish Wind energy Association) welcomes the opportunity to make this submission on the Leitrim's Draft County Development Plan 2021-2027 (draft Plan). Leitrim County Council is already aware of the fact that wind energy is a key sector for job growth and revenue in the lifetime of the draft Plan. A recent analysis of rate takes across Ireland noted that 21.87% of Leitrim's County Council total rate take in 2022 (€1,452,426.54) was from wind farm rates alone.¹

WEI would like to make a few brief comments on the draft Plan in relation to wind energy. 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 150 members who have come together to plan, build, operate and support the development of the country's chief renewable energy resource.

The criticality of onshore wind in Ireland's energy mix is apparent when the near-term trajectories in the Clean Energy Package Governance Regulation (2018) are considered. This requires all member states to submit National Energy and Climate Plans (NECP) setting out how each member state will contribute to the decarbonisation objectives of the European Union.

Following on from the 2019 Climate Action Plan, the Government published the National Development Plan 2021 – 2030 (NDP) on the 4th of October 2021 which increases Ireland's renewable electricity target to 80% by 2030 from the previous target of 70%. To achieve this **new 80% target**, the NDP earmarks a target of 5GW offshore wind and **a doubling of existing onshore wind from circa 4GW (today) to 8GW**

¹ Independent analysis undertaken on behalf of WEI 'Report on the rateable liabilities of wind farms' (2022). Numbers sourced from actual council budgets in 2022. RV/NAV information was sourced from the Valuation Office website on 28th February 2022

by 2030, signalling onshore wind as crucial in the roadmap to decarbonization. This increase to 80% should serve as a key policy indicator for onshore wind development going forward.

1 Chapter 12 Climate Action & Renewable Energy and Appendix IX Part B

WEI welcome the council's preparation of the Renewable Energy Strategy (RES) as part of the draft Plan. Upon review we believe that the RES in section 12.6.1 is well written WEI support the draft RES's underpinning:

*"To encourage and support the transition of Leitrim to a carbon neutral county through community engagement, energy efficiency and the sustainable development of renewable energy, whilst providing environmental and economic benefit at a local and national level and preserving the cultural heritage and visual amenity of the county"*²

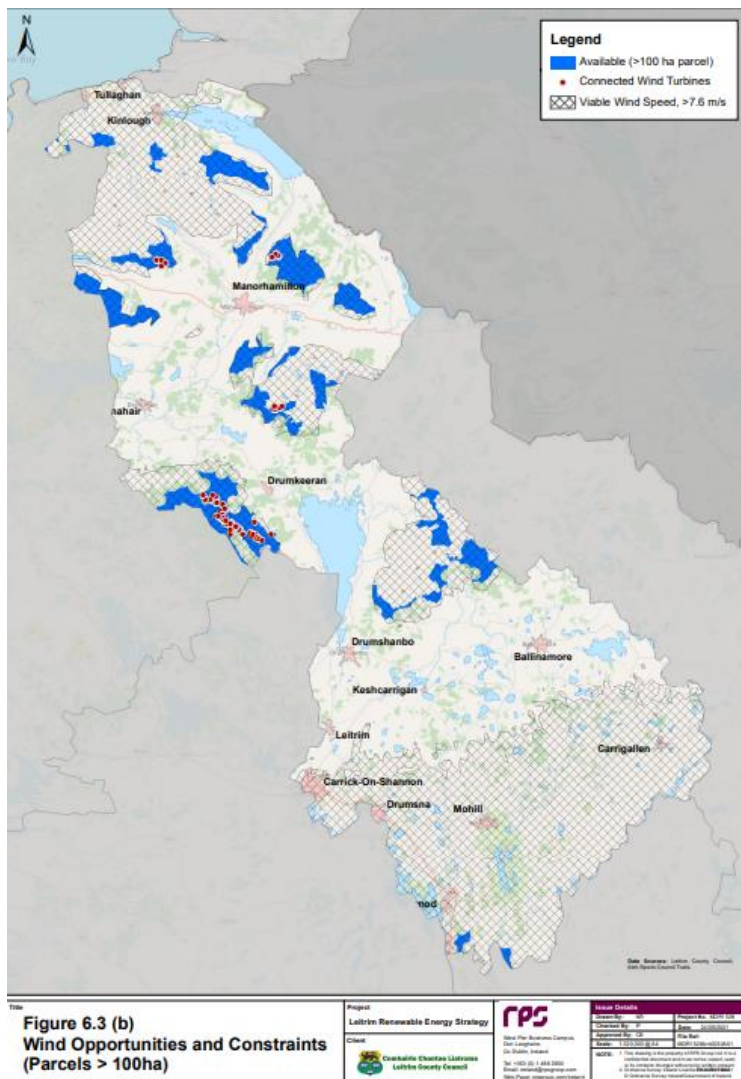
However, we do have a few concerns that we hope you will take into consideration. Firstly, WEI do not agree that wind speeds should be considered as a major challenge to the future development of onshore wind. Technological advancements have allowed modern wind turbines to access new areas with lower wind speeds. Thus, it would be removed from the mapping analysis which you have carried out.

Appendix IX Part B holds the maps related to the RES. Figure 6.3 (b) (Figure 1 below) is of particular interest to WEI. It is not clearly stated how the available areas shown below where decided. The constraints are noted *"... 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"*³ but the RES does not describe how they these constraints have been applied to the map creation. For example, if you take the constraint of Cultural Heritage, it is unclear how the council has assessed the renewable energy potential while *"preserving the architectural and archaeological heritage"*.⁴ No buffers have been explained or which sites have been included in the assessment.

² Leitrim Draft CDP Written Statement Volume 1, 2022 (pp. 286)

³ RES, 2022 (pp. 37)

⁴ Section 3.8.4, RES, 2022 (pp. 22)



(Figure 1: Wind Opportunities and Constraints)

Figure 6.4 notes that there is potential for turbines near the boundaries and on the peripheries of ‘available areas’. Given the lack of clear application of constraints noted above WEI would not be confident that this potential for turbines will be assessed correctly. WEI recommend that the text in the RES be updated to clarify this issue. We suggest doing so with the following amendment:

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.”

WEI would also recommend the deletion of the line *“There are no areas where new wind turbines would be considered ‘acceptable in principle’”* on page 39. The RES does not classify lands in the county for onshore wind development it only notes areas available as seen in Figure 1 above. Given this fact there is no reason for the above sentence to be included in the section called ‘Potential Wind Resource Summary’ in the draft RES.

Conclusion

The need to increase our renewable generation is clear. Onshore wind farm development is a proven technology that can deliver at pace and scale and is critical to achieving national targets and particularly targets over the six-year lifetime of the draft Plan. It is vital that we increase Ireland’s renewable energy capacity and decarbonize the energy sector. The urgency to secure Ireland’s energy generation has been starkly amplified with the ongoing energy supply risks throughout Europe because of the continued conflict in Ukraine. With that in mind,

WEI recommend that Leitrim County Council amend text on page 37, paragraph 1 of the RES and Amend text on page 39 of the RES.

WEI would like to thank the Leitrim County Council for providing an opportunity to consult on the draft plan. Please don’t hesitate to reach out if you wish to discuss any aspect of our response.

Yours sincerely,

Denis Devane

Senior Policy Analyst



E: denis@windenergyireland.com

W: www.windenergyireland.com