



IWEA Submission on Department of Housing, Local Government and Heritage's Statement of Strategy 2021 – 2025

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1 Introduction

The Irish Wind Energy Association ('IWEA') welcomes the opportunity to make this submission to Department of Housing, Local Government and Heritage (DHLGH) Statement of Strategy 2021 – 2025. Ireland currently has the highest share of electricity demand met by onshore wind in the world and it supplied almost 37 per cent of our electricity over the first six months of the year. This puts the country on track to reach our 2020 target of 40 per cent renewable electricity.

The Climate Action Plan (CAP)¹ set a new target of 70 per cent renewable electricity by 2030. This requires an additional 4,000 MW of onshore wind farms over the next ten years, reaching 8,200 MW overall. It will also require at least 3.5 GW of offshore wind farms in the same timeframe from an almost standing start. More recently the Programme for Government² has enhanced the ambition detailed in the CAP to 5 GW and set out for the first time a long-time ambition for floating offshore wind of 30 GW in our waters. It is anticipated that wind energy will save the most amount of carbon within the CAP.

The ambition that has been set out by Government is admirable and welcomed by an industry which is well primed to deliver on these projects with a very healthy pipeline of both onshore and offshore projects at varying stages of development in the development pipeline. There are currently over 16 GW of offshore wind energy projects in development in our maritime area alongside of a very healthy pipeline of 8 GW of onshore wind energy projects in development³.

There are, however, significant policy system challenges that must be addressed if Ireland is serious about achieving our climate action targets, none more so than planning and consenting of these projects and the resourcing of same. For the purpose of this paper we have focussed in on the planning related policies that the DHLGH and their supporting agencies such as An Bord Pleanála (ABP) and National Parks and Wildlife Service (NPWS) are responsible for, and to flag the level of resourcing and budget required to address these significant challenges and ensure Ireland can remain on track to reach our 2030 target of 70 per cent renewable electricity by 2030.

IWEA has developed a four-part series of reports setting out the policy changes required to ensure Ireland reaches the target set in the CAP to source 70 per cent of our electricity from renewable energy by 2030 and we would be happy to meet with the relevant parties to discuss the content of these reports in more detail.

¹ <https://www.gov.ie/en/publication/ccb2e0-the-climate-action-plan-2019/>

² <https://static.rasset.ie/documents/news/2020/06/programmeforgovernment-june2020-final.pdf>

³ <https://iwea.com/images/IWEA-Onshore-and-Offshore-Wind-Pipeline-Report-August-2020-BLANK.pdf>

IWEA note that in the previous iteration of the Department's Statement of Strategy 2017-2020⁴ there is little mention of renewable energy development other than the finalisation of the onshore Wind Energy Development guidelines which is still ongoing. Considering the development of onshore and offshore wind energy is a strategic priority for the Government, we do not believe that planning policy issues and associated resources should be allowed to hold up developments utterly critical to decarbonising our energy supply.

IWEA believes the Department's Statement of Strategy 2021-2025 should highlight the strategic importance of wind energy and other renewable energies and have a strategic goal and standalone section detailing the role of the Department and its supporting agencies in the delivery of renewable energy infrastructure and the associated resourcing and budgetary requirements.

2 Onshore Wind Energy in Ireland

The Department's Statement of Strategy 2017-2020⁵ notes that its mission is to support sustainable development with a particular focus on strategic planning. Under its list of strategic goals⁶ it makes no mention of our renewable electricity targets under the CAP or the development of renewable resources. IWEA believes the Department missed an opportunity by not placing climate action and renewable energy development at the centre of its mission to support sustainable development.

Onshore wind has played a key role in the development of Ireland's renewable energy supply and will continue to do so in the future. Ireland has built over 250 onshore wind farms, mostly since 2003, with a combined capacity of approximately 4,200 megawatts (MW)⁷(Figure 1). Even though these wind farms are supplying Ireland with the highest share of electricity demand generated by onshore wind in any EU electricity system, the resource in Ireland is so large that Ireland's turbine density is relatively low by other EU standards⁸. Onshore wind needs to continue growing in Ireland to meet future renewable energy targets with Ireland's CAP. But to achieve this we need to reform Ireland's broken planning system.

⁴ https://www.housing.gov.ie/sites/default/files/publications/files/20180501_-_statement_of_strategy_2017-2020_english_published.pdf

⁵ DHPLG, (2017), 'Statement of Strategy 2017 – 2020', Link: https://www.housing.gov.ie/sites/default/files/publications/files/20180501_-_statement_of_strategy_2017-2020_english_published.pdf

⁶ DHPLG, (2017), 'Statement of Strategy 2017 – 2020', (pp. 6).

⁷ IWEA, (2020), 'Connected Database'.

⁸ WindEurope, (2020), Link: <https://windeurope.org/data-and-analysis/product/wind-energy-in-europe-in-2019-trends-and-statistics/>

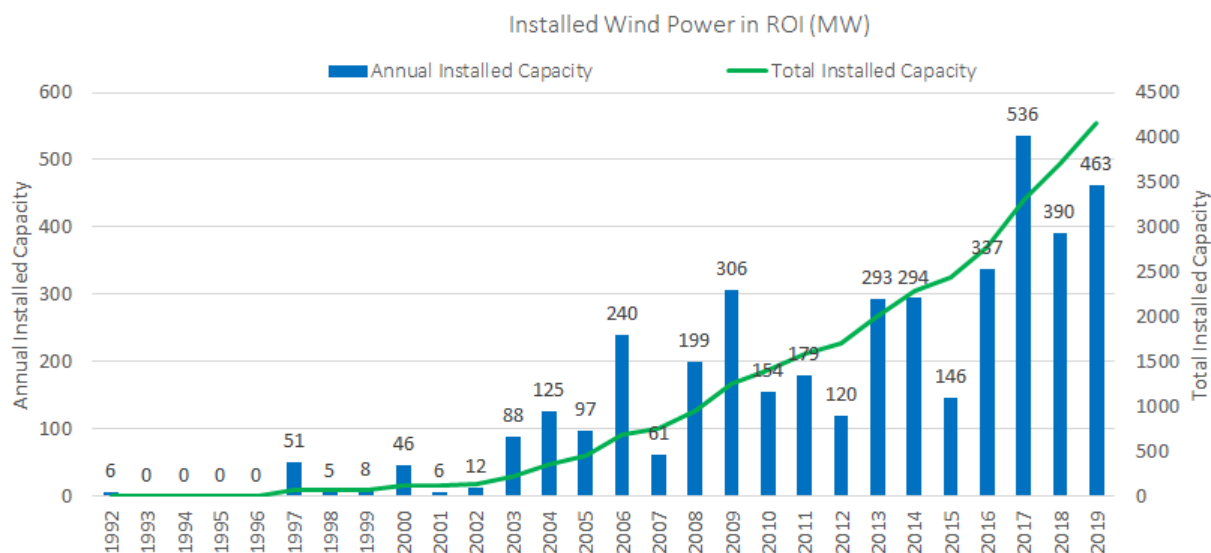


Figure 1: Installed capacity of onshore wind in Ireland since 1992.

2.1 Broken Planning System and Bottlenecks

Planning difficulties in Ireland are slowing down the pace of renewable energy development and pose challenges to the national priority of reinforcing the transmission system. An effective planning system and a stronger transmission grid will together provide the foundation for a modern electricity system which will rely on renewable energy to power our homes, our economy and our society. A typical wind energy project is currently taking between 8 to 12 years to clear the consenting process and to be built. This can only be improved through reform and, more importantly, adequate resourcing. IWEA has conducted research and published a report that clearly shows it is now one of the biggest barriers to decarbonising Ireland’s electricity supply⁹.

IWEA urges a series of changes to speed up the planning process and its priority recommendations include:

- **Planning decisions need to be made faster, particularly timelines for appeals to An Bord Pleanála, which are currently 59 weeks instead of the Board’s own 18 weeks statutory objective;**
- **Enable developers to apply for planning permission for the wind farm’s cable connection at the same time as they apply for permission for the project itself;**
- **The current wind energy planning guidelines need to be finalised based on rigorous scientific evidence and must strike the right balance between the need to develop new wind farms and the concerns of those opposed to renewable energy;**

⁹ IWEA, (2020). ‘Building Onshore Wind: 70 by 30 Implementation Plan’ Link: <https://iwea.com/images/files/iwea-building-onshore-wind-report-lr.pdf>

- **Introduce pre-planning consultation for Strategic Infrastructure Development (SID) applications and streamline the process for deciding on applications for SID status.¹⁰**

IWEA's proposed solutions identify the most important areas of planning system that require reform. However, to achieve our suggested reforms, the issue of adequate resourcing must be tackled. The allocation of Government resources has always been a difficult issue. But, given the accelerated impacts of climate change and our increased EU targets, any Departmental strategy must make adequate staff and resources available to local authorities and ABP.

IWEA believes the Department's Statement of Strategy 2021-2025 should be mindful of the need for adequate resourcing and staffing of ABP and the planning functions of local authorities. Without enough financial support the local authorities will struggle to deal with increased applications from onshore wind farms, as well as solar farms and other renewable energy projects, and struggle to meet our CAP obligations.

3 Offshore Wind Energy

There has been a policy revolution in the marine space in Ireland over the past two years. This was given huge momentum by the publication of the CAP in 2019 which was a game changer for the offshore wind industry in Ireland, with a target of at least 3.5GW of offshore wind by 2030 – from an almost standing start. This has given some certainty to investors that Ireland is now at last open for business and there is now a pipeline of projects of 16 GW, made up of 23 distinct projects, at varying stages of development in our maritime area.

3.1 Resourcing of the new process

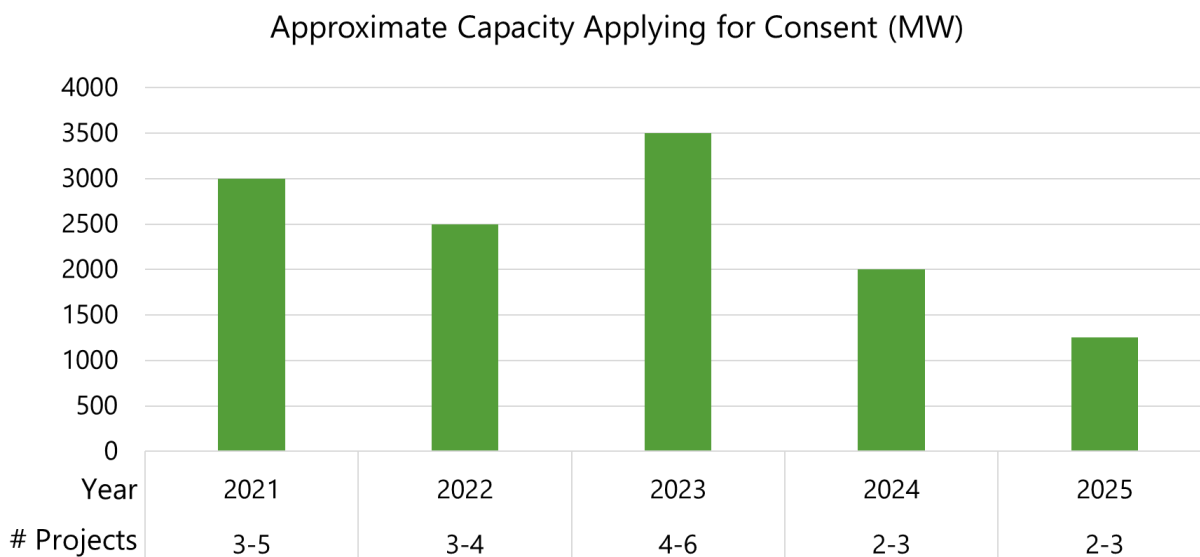
The Marine Planning and Development Management Bill is scheduled for enactment in Q1 of 2021 and will provide a new streamlined State consent process for delivering offshore developments in our maritime area. This will include projects applying to ABP for the onshore and offshore elements of the project alongside of a maritime area consent, or leasing of the seabed, from the department responsible (DECC for offshore wind). This is a new process for Ireland and there will be a need to recruit and upskill across the relevant bodies at all levels of responsibility. It should be pointed out

¹⁰ IWEA, (2020). 'Building Onshore Wind: 70 by 30 Implementation Plan', (pp. 6), Link: <https://iwea.com/images/files/iwea-building-onshore-wind-report-lr.pdf>

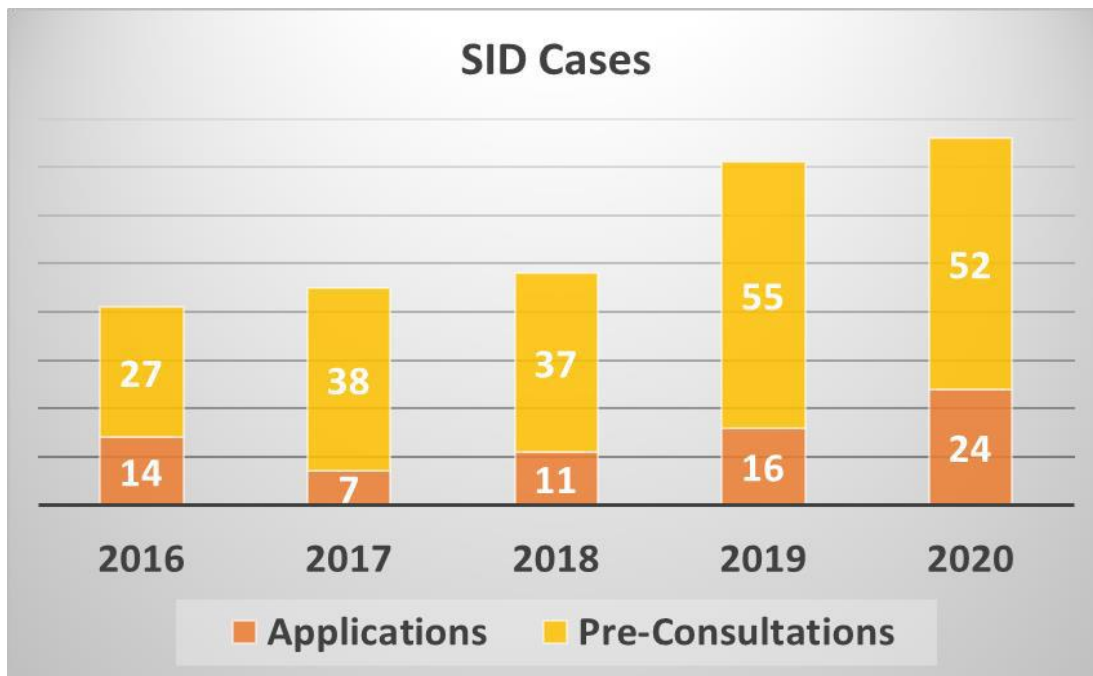
here that offshore wind is larger, more complex and in a unique environment compared with onshore renewable energy development. There is currently limited expertise in offshore wind energy development in the Department and in ABP to process these kinds of applications and substantial investment in new personnel and skills is urgently required.

3.2 The Scale of The Problem

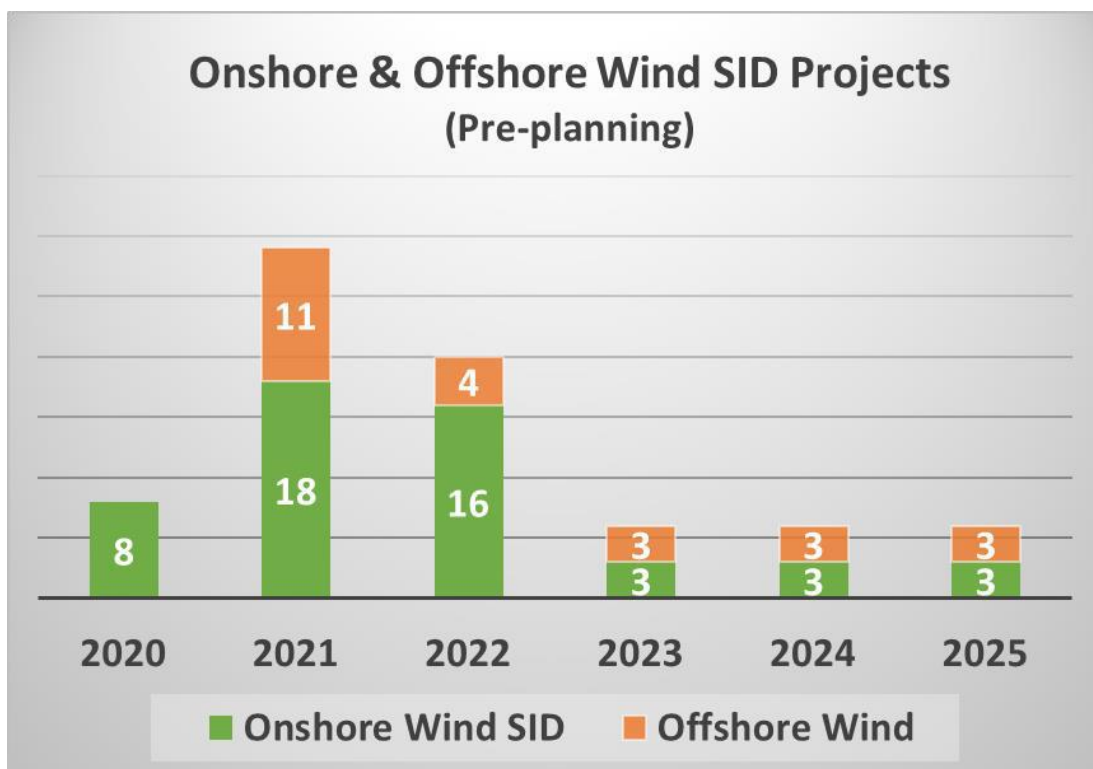
It is important, therefore, that the Department and ABP are aware of the volume and scale of offshore wind energy projects on the horizon. On average the capacity size of projects in the 16GW pipeline is 700 MW with the figure below indicating when this capacity expects to apply for consent.



Due to the scale of these offshore wind energy projects it is anticipated that SID provisions are made to process the pipeline of applications. It is anticipated that each project application will be the equivalent of a large-scale SID with the need to deal with multiple applications in parallel. SID cases have increased in volume from 35% of the yearly average to 50% from the addition of onshore wind energy projects alone and the figure below indicates the level of applications and pre-consultations from 2016 – 2020.



Furthermore, the figure below highlights the anticipated number of SID pre-planning engagements for both onshore and offshore wind out to 2025 with meaningful and formal engagements required to commence on enactment of the Bill.

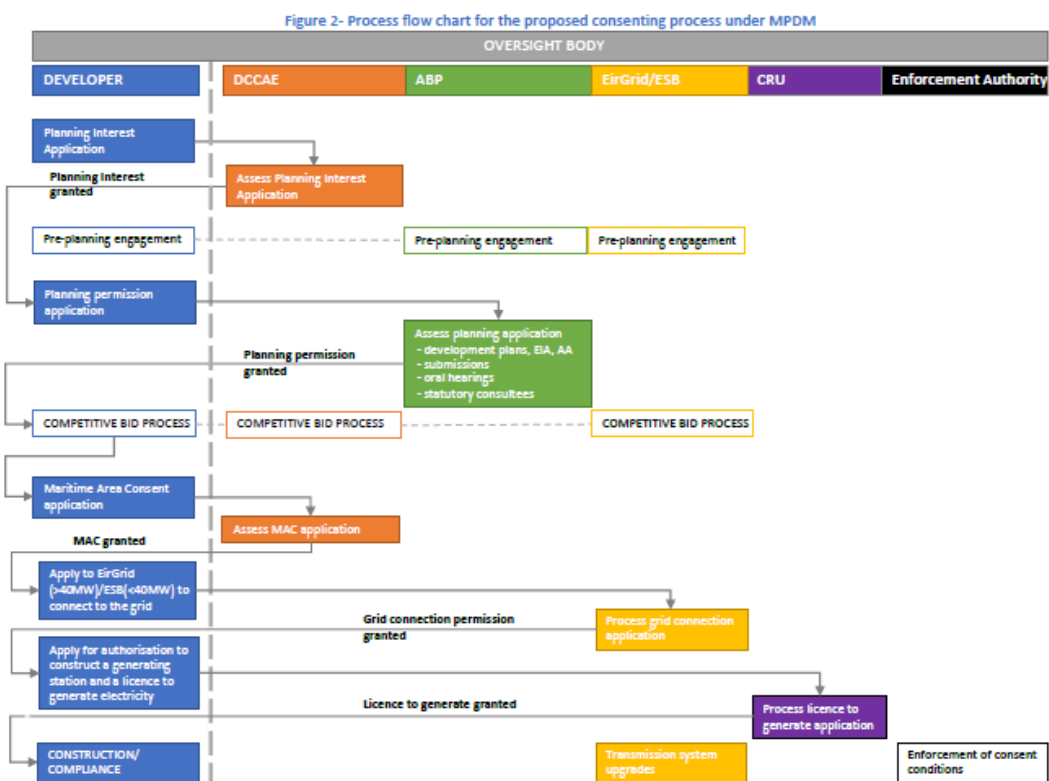


IWEA would like to bring to the attention of the Department, the Board and statutory consultees that there will be over 11 large scale offshore wind energy projects engaging with ABP and NPWS within 6 months of enactment of the legislation.

IWEA believes that resourcing is key if the Government’s future offshore wind energy ambitions are to be realised with a need to urgently recruit planning inspectors, board members and an external panel of experts.

3.3 Eirwind Research Recommendations

A recent paper, published as part of a recent industry academia research project Eirwind¹¹ in MaREI, UCC, focussed upon HR resourcing within Government departments for delivering offshore wind which is summarised in the figure below. The recent EirWind report, *Blueprint for Offshore Wind in Ireland 2020-2050*, estimated that up to 30 new personnel need to be recruited to various Government departments and State agencies over the next 18-24 months to support the development of offshore renewables. The Eirwind study recommends that a minimum of 10 staff within An Bord Pleanála should be dedicated to processing these applications. Both the DHLGH and DECC will need additional resourcing to ensure expertise and efficient marine planning and consenting processes going forward. It is also recommended that resources are fed into the statutory consultees to ensure proper consultation and to prevent challenges on nature conservation grounds creating lengthy delays. For this reason also, the establishment of a coordinated scientific research and data collection programme is recommended to support the marine spatial planning and consenting processes.



¹¹ <https://www.marei.ie/project/eirwind/>

3.3.1 Recent evidence of resourcing issue within DHLGH and potential impacts

As part of the development process for offshore wind energy developments and prior to the enactment of the MPDM process, projects must apply for and receive a foreshore licence from DHLGH to carry out the requisite environmental surveys in the marine environment. These licences allow developers to investigate the suitability of foreshore locations for the development of offshore renewable energy. Without a licence a developer cannot carry out these investigations which are an essential first step towards a subsequent planning application.

IWEA was recently been contacted by the Foreshore Unit within the Department who have informed us that – assuming a static level of resources – they would be deprioritising any existing and future applications for offshore wind farms off Ireland’s southern and western coasts. This will essentially stall wind energy development as projects will not be able to progress to the next stage of the planning process without the environmental surveys required. The prioritisation put forward by the Foreshore Unit has the potential to impact upon the 5 GW target put forward in the Programme for Government and will have a significant knock on effect to the timeline of these projects.

While such an immediate issue may be outside the scope of a five-year strategy it is, we believe, an appropriate example of the risk to offshore renewable energy development from under resourcing.

As detailed above, additional resources will be required imminently for the offshore consenting process within An Bord Pleanála and the Department of Environment, Climate and Communications, so the news that a shortage of resources at the very first step (i.e. the granting of foreshore licences) is bringing the majority of projects to a standstill is very concerning for IWEA members and for the future of offshore wind energy development in our waters. The urgency of the problem is reflected in the fact that over the last three years we believe only a handful of projects have had their applications processed with approximately 30 applications needing to be processed by the Foreshore Unit at present.

To be in a position to contribute to our 2030 targets a project will very likely need this licence by 2021 so the time available to ensure a sufficient pipeline of projects to hit our 2030 targets is very short.

IWEA recommends that a resource roadmap be developed for offshore wind, with significant marine experience developed imminently, in advance of key legislation being enacted.

4 Conclusion

Without adequate resourcing to implement Government policy, our targets for decarbonisation will not be met and an opportunity to exploit our remarkable wind energy resources and reap the economic rewards will be missed.

IWEA would be happy to meet with you to discuss this matter at any time, in particular our views on what is required to deliver our 2030 ambitions, which we believe is critical to establish the resources required