



Submission on Proposed Variation No.2 to the Monaghan County Development Plan 2019-2025

9 October 2020

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1 Introduction

The Irish Wind Energy Association ('IWEA') welcomes the opportunity to make this submission to the consultation on *Proposed Variation No.2 to the Monaghan County Development Plan 2019-2025*. We welcome that a review has been undertaken by the Council to assess and ensure coherence and alignment with national and regional policy following the completion of the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES).

We note that the review of the CDP concludes that the document is consistent with the NPF and the RSES and no specific alternations are needed. While we welcome the acknowledgement that *"for the purposes of clarity the provisions of the NPF and the NWRA RSES will take precedence over the provisions of MCDP"*, we believe that specific alternations are required to ensure coherence with national policy particularly the Climate Action Plan which was concluded in June 2019.

We believe Monaghan County Council needs to initiate further variations to ensure alignment with national policy. We outline areas which we believe Monaghan Co. Co. should address through variations to its CDP in sections below. We recommend Monaghan Co.Co prepare an ambitious Renewable Energy Strategy, reflect national targets in its CDP and adopt additional policies in support of wind energy.

2 National Policy

Ireland's climate targets need to be documented in Monaghan's CDP. The National Climate Action Plan (CAP) which was published in June 2019 has set an ambitious 70% target for renewable electricity production by 2030. To meet this target, the amount of electricity generated from renewables will have to be doubled on current figures. Figures 4.4 and 7.5 of the CAP illustrate Ireland's current and projected renewable electricity production requirements to meet the 70% target. Based on the CAP assumptions, onshore wind will provide the majority of the required electricity yield out to 2030.

Figure 4.4 Ireland's Decarbonisation Pathway Dashboard to 2030¹⁵

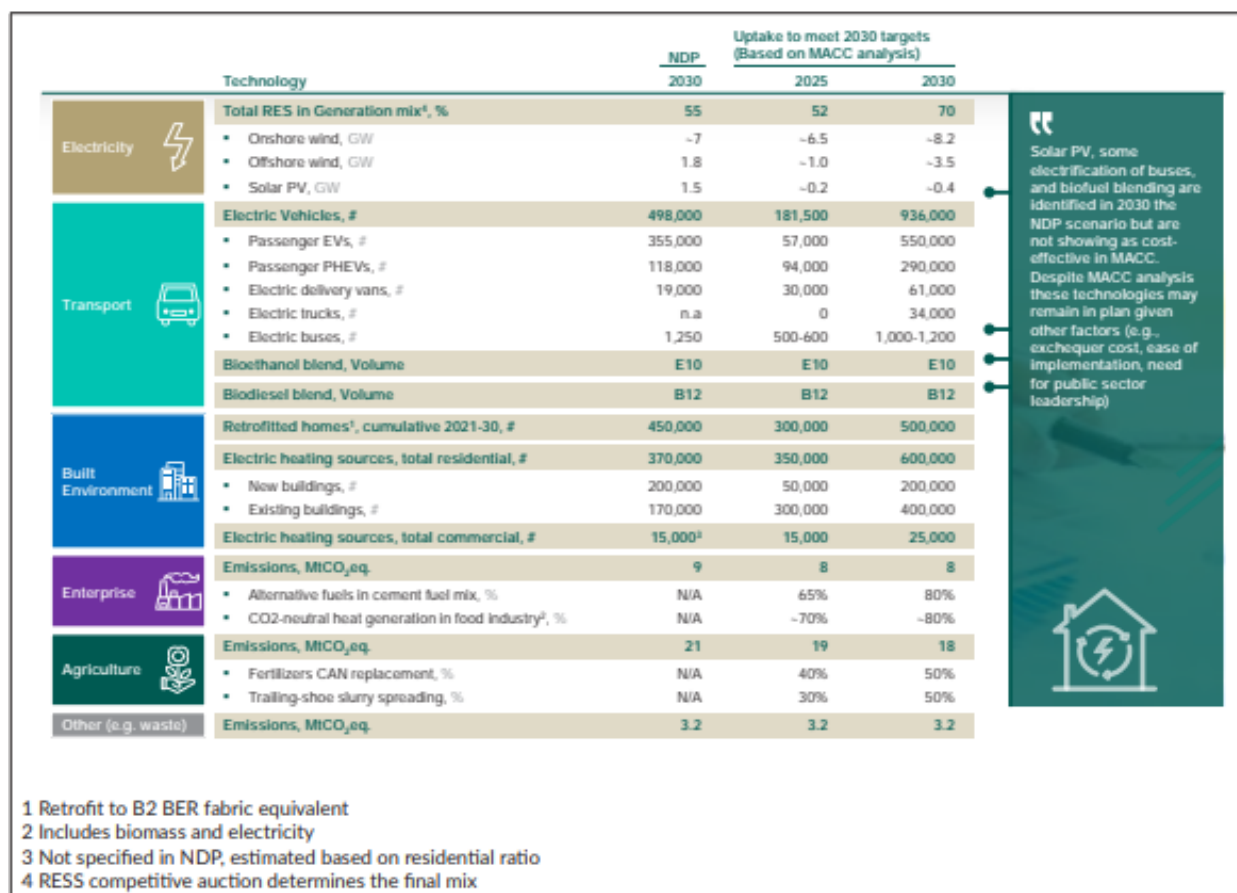


Table 7.5 Potential Metrics to Deliver Abatement in Electricity

Key Metrics	2017	2025	2030	2030
		Based on MACC	Based on NDP	Based on MACC
Share of Renewable Electricity, %	~30% ²⁰	52%	55%	70%
Onshore Wind Capacity, GW	~3.3	6.5	N/A	8.2
Offshore Wind Capacity, GW	NA	1.0	N/A	3.5
Solar PV Capacity, GW	NA	0.2	N/A	0.4
CCGT Capacity, GW	~3.6	5.1	N/A	4.7

The Department of Housing, Planning, Community and Local Government (DHPCLG) Section 28 Guidelines 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change' (July 2017) clearly set out that it is a specific planning policy requirement under Section 28 (1C) of the Act that, in making a development plan with policies or objectives that relate to wind energy development, the relevant planning authority shall carry out the following three actions:

1. Ensure that overall national policy on renewable energy is acknowledged and documented in the development plan
2. Indicate how the implementation of the development plan will contribute to realising overall national targets on renewable energy and climate change mitigation and in particular wind energy resources (in MW) and,
3. Demonstrate detailed compliance with item no. 2 above with regard to development management objectives and have such development management objectives subject to SEA and AA with regard to likely significant effects on climatic factors in addition to other environmental factors.

Specific Planning Policy Requirement (SPPR) 1 in the draft Wind Energy Guidelines 2019 also stipulates that Development Plans should identify on maps areas *"where there is significant wind energy potential and where.... Wind energy developments will be acceptable in principle... open to consideration... generally discouraged."* We outline our views on the methodology that should be used to identify suitable lands in subsequent sections.

To generate 70% of the county's electricity from renewable energy by 2030, the Government's Climate Action Plan requires the installation of 4,000MW of new wind energy developments over the next decade. These targets need to be documented in Monaghan's CDP and the county's plans for contributing to them outlined.

Recommendations:

- To ensure adherence with national planning policy, Monaghan County Council should prepare a renewable energy strategy.
- The approach to wind energy needs to be covered in detail in the strategy to ensure compliance with Specific Planning Policy Requirement (SPPR) 1 in the draft Wind Energy Guidelines 2019 which stipulates that Development Plans should identify on maps areas *"where there is significant wind energy potential and where.... Wind energy developments will be acceptable in principle... open to consideration... generally discouraged."*

- Monaghan Co. Co. should also acknowledge the 70% renewable target and 4GW target outlined in the Climate Action Plan in its CDP.
- Variations should be made to Monaghan’s CDP to reflect this and how Monaghan is going to contribute to this target.

3 Policy Ambition

IWEA encourages Monaghan County Council to take an ambitious approach to deciding the actual installed capacities of wind energy the new Renewable Energy Strategy for County Monaghan is going to aim to facilitate.

To-date, there does not appear to be any central Government or Regional Assembly guidance on how many MW or GW of new wind energy development each Local authority should provide for. In this absence of such guidance, Monaghan County Council should seize the opportunity and seek to identify enough land to accommodate as much as possible of the additional 4.2GW of additional onshore wind energy required by the Climate Action Plan by 2030.

The quantum of land identified as potentially suitable for wind energy development must go far beyond the actual amount required, to allow for a natural attrition rate across development sites and projects.

To deliver 4.2GW of new wind energy capacity onshore by 2030 to meet the Climate Action Plan’s target, will require a sufficient quantum of land to accommodate many multiples of 4.2GW to be classified as suitable for wind energy. This multiple is required to allow for the natural attrition rate of the wind energy development process, where every site or area that has theoretical potential, cannot convert that theoretical potential into actual potential, as illustrated in the graphic opposite, taken from the SEAI Methodology for Local Authority Renewable Energy Strategies.

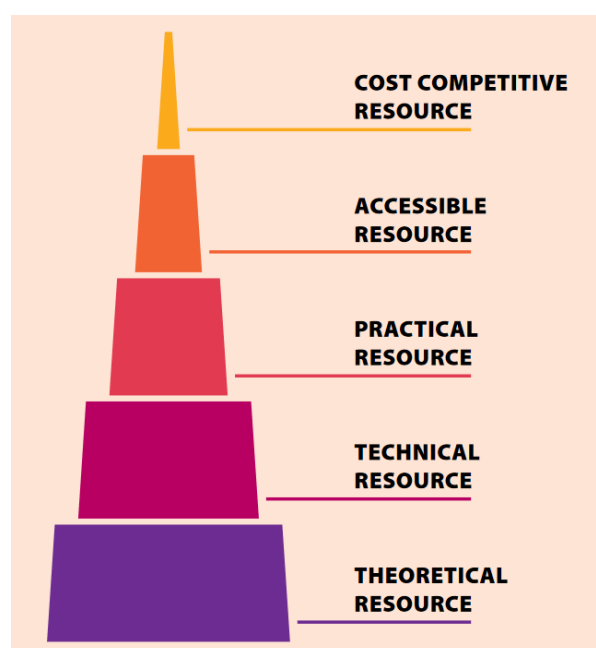


Figure 5: Geographical representation of sieve analysis approach (Methodology for Local Authority Renewable Energy Strategies, SEAI)

The theoretical resource is reduced for many reasons. Even where a site is considered suitable for a wind energy development in a renewable energy strategy, landowners may not be agreeable to accommodating a project on their lands. If landowners are agreeable, site-specific environmental constraints such as bird activity, peat depth/stability or a high concentration of neighbouring properties might rule a site out. If no such constraints exist, a project's planning application could still be refused permission, or if granted, overturned on judicial review. If granted permission, a project may not be able to secure an economically viable grid connection or be able to find a route to market for its electricity that make the construction of the project a commercially viable proposition. These are just a few examples of the hurdles a project must clear to convert theoretical potential to actual, delivered capacity. To deliver 4.2 GW of new onshore wind by 2030, is likely to require a quantum of land sufficient to accommodate 15-20 GW of land to be identified as suitable for wind energy, if we want to see 4.2 GW actually delivered and connected based on a theoretical analysis and a view from IWEA members on likely success rates.

Recommendation:

- IWEA strongly suggests that the County Development Plan and Renewable Energy Strategy for County Monaghan classify a sufficient quantum of land as being suitable for wind energy, to ensure national renewable energy targets can be achieved, and demonstrate how the quantum of land classified as suitable is sufficient for this purpose.

4 Methodology

IWEA would strongly encourage Monaghan County Council to adopt the LARES approach to the preparation of the new Renewable Energy Strategy as part of additional variations to the Monaghan County Development Plan.

Monaghan County Council will be aware of the Department of Housing, Planning and Local Government's (DHPLG) recent public consultation on the Draft Revised Wind Energy Development Guidelines, and specifically Chapter 3 of the draft guidelines on planning for wind energy development through the Local Authority development plans and wind or renewable energy strategies.

In our submission to DHPLG on the Draft Revised Wind Energy Development Guidelines, IWEA has already suggested that the step-by-step guide outlined in Section 3.6 Draft Revised Wind Energy Development Guidelines should be strengthened to give clearer direction to planning authorities on the need to consult with neighbouring planning authorities to ensure a consistent approach across county boundaries, and that this interaction with adjoining Local Authorities be made a mandatory part of the preparation of a Renewable Energy Strategy and County Development Plan. IWEA similarly encourages Monaghan County Council to engage with its adjoining Local Authorities ensure a consistent approach is taken across county boundaries as each Local Authority moves to prepare or review its Renewable Energy Strategy.

Recommendations:

When preparing the new Renewable Energy Strategy for County Monaghan, IWEA urges Monaghan County Council **not** to consider the following potential constraints or facilitators in the process of identifying areas as being potentially suitable for wind energy developments:

1. **Grid Capacity** - Existing or planned electricity grid capacity should not be considered a constraint for the purposes of determining whether areas of County Monaghan are suitable or unsuitable for wind energy development. Grid capacity is a technical and electrical engineering constraint that is managed by the TSO/DSO and new infrastructure is often provided on the basis of there being a need to connect wind energy developments to the electricity grid, thereby further reinforcing grid infrastructure in counties where this work would not otherwise have occurred without wind energy development.
2. **Wind Speed** - Wind speed should not be used as a constraint for site suitability or unsuitability at the strategy preparation stage, as wind turbine technology is quickly evolving to be able to harness lower wind speeds than was not thought possible only a few years ago. The SEAI Wind Atlas of Ireland is also derived from a computer model and would not be as accurate as on-

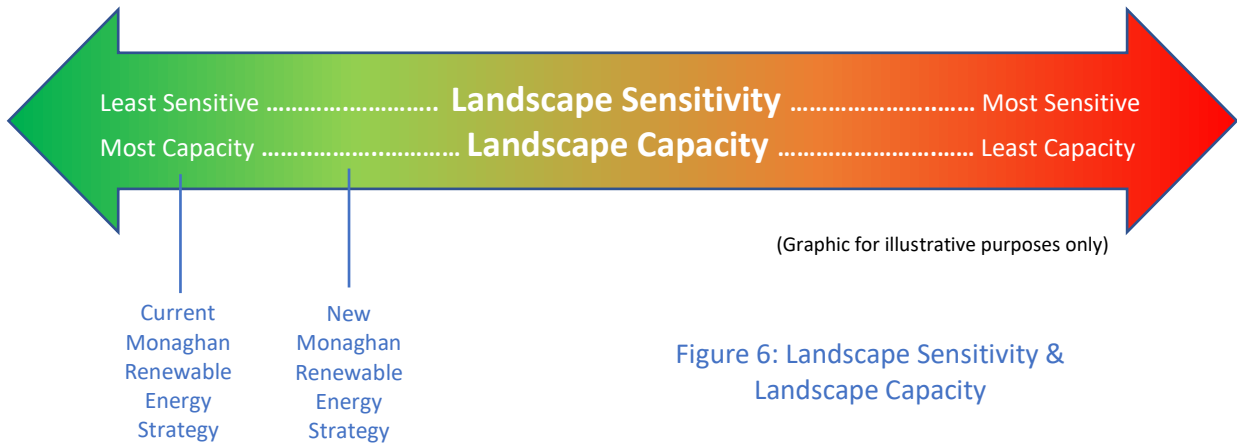
site wind measurements which are used by wind energy developers to verify a site's wind regime as being viable. Therefore, for these two reasons, to exclude areas solely based on wind speeds derived from a national wind atlas would be an overly conservative approach and would unnecessarily prevent a suitable classification being applied to what otherwise could be a perfectly viable site.

3. **Nature Conservation Areas** - Areas designated for nature conservation should also not be automatically excluded from accommodating new or repowered wind energy projects. This is because, for example, in such constraints-led studies, Special Protection Areas (SPAs) would typically be deemed unsuitable. However, there is greater than 1GW (1,000MW) of wind energy developments currently in operation in SPAs. Considering such SPAs as unsuitable for future wind farms prevents the existing projects from being re-powered in years to come and would prevent innovative measure being proposed that could do more to achieve conservation objectives of SPAs than the alternative of doing nothing or decommissioning.

4.1 Landscape Capacity and Landscape Sensitivity

County Development Plans and Renewable or Wind Energy Strategies providing locational guidance for the siting of wind farms, have traditionally directed them towards landscapes of lower sensitivity. These lower sensitivity landscapes would generally be considered to have a higher capacity to accommodate wind energy developments, or in fact any type of development. As illustrated in Figure 6 below, the least sensitive landscapes would generally be considered to have the most capacity to accommodate development, while the most sensitive landscapes would generally be considered to have the least capacity to accommodate development.

As decarbonisation and renewable energy ambitions increase, wind energy developments will have to extend from the least sensitive landscape areas with the most capacity, into areas of slightly more sensitive landscape.



The Government’s Climate Action Plan will require a further 4.2GW of wind energy to be installed onshore by 2030. This additional 4.2GW will have to be located in areas of slightly greater landscape sensitivity than the 4GW already installed. However, there remains significant landscape capacity across the country and across County Monaghan to fulfil the State’s onshore wind energy and renewable energy ambitions. The most scenic parts of County Monaghan can still be protected and deemed not normally permissible for wind energy in the new Renewable Energy Strategy for County Monaghan, but it may be necessary to extend the areas that will be considered suitable for wind farm development into slightly more sensitive landscape areas if we are to deliver on the requirements of the Government Climate Action Plan over the coming decade.

5 Regional Approach

IWEA acknowledges that Monaghan County Council is only responsible for its own functional area and that the new County Development Plan and Renewable Energy Strategy for County Monaghan will only extend as far as the Monaghan County boundary. However, IWEA would like to highlight to Monaghan County Council where it is expected the new Renewable Energy Strategy for County Monaghan will fit into a regional and national planning policy context in the future.

IWEA has been advocating for a regional-approach to the spatial planning of wind farm developments for some time, to compliment the Local Authority-level approach that has been the case to-date. IWEA previously prepared a Discussion Document (available upon request) on this specific topic which outlines the following benefits of a regional approach:

- It fits within and neatly compliments the Regional Spatial and Economic Strategies (RSES) now prepared for the three regions. (As the three RSES policy documents have now been formally adopted, spatial plans for renewable energy projects can be progressed as supplementary work streams by the Regional Assemblies and compliment the RSES).
- A single, consistent methodology can be used across an entire region and across all three regions in the country, including across county and local authority boundary areas where approaches to-date have been inconsistent in many cases.
- A regional approach would ensure that the optimum locations for wind energy development are identified, and every county's potential is assessed in a regional and national context, in direct comparison with the rest of the region.
- It would ensure that national targets, objectives and requirements for the delivery of wind energy, directly translate into the identification of suitable areas and corridors, and a sufficient quantum of land is identified and deemed appropriate to ensure national targets, objectives and requirements can be delivered.
- Landscape sensitivity, value and capacity can be assessed on a broader, regional scale, rather than just within the sometimes-limited confines of an individual county. This would provide consistent, evidence-based landscape policies across local authority areas, and ensure the appropriate landscape policies are implemented irrespective of the county boundaries. This would ensure that wind and other electricity infrastructure projects that span or are visible across county boundaries, can be assessed in a consistent landscape policy context.
- Landscape sensitivity and capacity assessments could be undertaken for wind energy and other electricity infrastructure on a regional basis, without needing the National Landscape Strategy to be completed. While the National Landscape Strategy will have to provide for all

forms of development and types of land uses, the assessment of landscape sensitivity and capacity specifically for wind energy and electricity infrastructure is a much more defined work stream, that could be progressed in advance. Existing Local Authority landscape policies can be used to align landscape values across a region, to ensure existing local policy is fully considered when moving to a regional approach for the assessment of landscape sensitivity and capacity for wind energy and other electricity infrastructure.

A regional approach to the spatial planning for wind energy was suggested by IWEA as far back as March 2018 and is still considered vital if the transition to a low carbon economy in the coming years is to be successful. IWEA maintains it is essential to plan for this transition, on the basis of the three Regional Assembly areas, in addition to the 31 Local Authority areas as has been the case to-date. The regional approach would undoubtedly provide a more appropriate platform for ensuring national policy can be transposed effectively to local level, and ensure a consistent approach is used across the entire country that reflects Government policy.

With this regional approach in mind, IWEA engaged proactively in the public consultation processes run throughout 2018 and 2019 on the Regional Spatial and Economic Strategies (RSESs) resulting in the following policy objectives being incorporated into the adopted RSES documents.

The Northern & Western Regional Assembly's RSES adopted on 24th January 2020 includes the following objective:

“RPO 4.16 The NWRA shall co-ordinate the identification of potential renewable energy sites of scale in collaboration with Local Authorities and other stakeholders within 3 years of the adoption of the RSES. The identification of such sites (which may extend to include energy storage solutions) will be based on numerous criteria including environmental matters, and potential grid connections.”

The Eastern & Midland Regional Assembly's RSES adopted on 28th June 2019 includes the following objective:

“RPO 7.35: EMRA shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are

addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones.

The Southern Regional Assembly's RSES was adopted on 31st January 2020 and includes the following objective:

*"RPO 94 Regional Renewable Energy Strategy
It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders*

In addition to the Local Authority-based approach to incorporating renewable strategies into their respective development plans, to compliment the Renewable Electricity Policy and Development Framework (REPDF) currently being prepared by the Department of Communications, Climate Action and the Environment (DCCA), IWEA will continue to advocate for the preparation of Regional Renewable Energy Strategies to be accelerated and prioritised by the three Regional Assemblies. Only the Regional Renewable Energy Strategies can ensure that a sufficient quantum of land within each region is identified as having wind energy potential sufficient to meet the national requirements.

6 Reference to Wind Energy Development Guidelines

IWEA believes that the new Renewable Energy Strategy for County Monaghan should not seek to replace or alter the requirements of the Wind Energy Development Guidelines, currently the subject of a targeted review by the Department of Housing, Planning and Local Government. The 2006 version of these guidelines provided guidance in relation to noise, shadow flicker, setback distance and other project-level design criteria. These, and other design criteria are likely to be updated as a result of the ongoing review of these Guidelines. The new County Development Plan and Renewable Energy Strategy for County Monaghan should refer to these Guidelines and require future proposed wind energy developments in County Monaghan to comply with the guidelines of the day. The Department has clearly stated on numerous occasions the 2006 guidelines remain in effect until they are replaced. The new County Development Plan and Renewable Energy Strategy for County Monaghan need not and should not seek to alter or vary whatever guidance emerges from the Department by way of the targeted review, but should just refer to the Departmental guidelines as setting the project-level design standards that will be expected of any wind farm developments proposed for County Monaghan.

Recommendation:

- The consistent implementation of the Wind Energy Development Guidelines – a key piece of national policy currently under review - is of crucial importance. We would urge the council to not go beyond what is required by the WEDG to ensure that the development of onshore wind in the county is not unnecessarily restricted.