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Administrative Officer,
Planning & Enterprise Development Department,
Clare County Council,
Áras Contae an Chláir,
New Road, Ennis,
Co. Clare

By email: to forwardplan@clarecoco.ie

Date: 29th February 2016

Re: Draft Clare County Development Plan 2017-2023

Dear Sir/Madam,

The Irish Wind Energy Association (“IWEA”) welcomes the opportunity to comment on the **Draft Clare County Development Plan 2017-2023**. As the County Development Plan will inform the vision, objectives and policies of the new plan for County Clare (2017-2023), including its Wind Energy Strategy (WES) and its Renewable Energy Strategy (RES), IWEA feels it is critically important to make a submission at this consultation stage. We very much welcome the opportunity and look forward to engaging constructively with you in the future as this plan progresses.

IWEA would like to reiterate that we welcome Clare County Council’s positive support of renewables and wind energy in particular. Renewable energy development is a vital part of Ireland’s strategy to tackle two major challenges facing us today – ensuring a secure supply of energy and combating climate change.

We thank you for the opportunity to contribute to this consultation and we look forward to contributing further as the strategic plan progresses.

Yours sincerely,

*sent by email, no signature required

Brian Dawson,
Head of Communications,
Irish Wind Energy Association.

1.0 Introduction

The Irish Wind Energy Association (“IWEA”) is Ireland’s leading renewable energy representative body and as such has an active interest in the potential for sustainable energy. IWEA is committed to promoting the use of wind energy in Ireland and beyond as an economically viable and environmentally sound alternative to thermal or nuclear generation and promotes awareness and understanding of wind power as the primary renewable energy resource.

Renewable energy development is a vital part of Ireland’s strategy to tackle two major challenges facing us today – ensuring a secure supply of energy and combating climate change. IWEA supports proper planning and sustainable development and recognises that the development of wind energy projects must afford clear protection to residents while enabling Ireland to develop our renewable energy resource and in turn meet our EU2020 targets. IWEA Members are involved in developing more than 85% of the wind farm capacity that is planned to be built between now and 2020.

1.1 EU Commitments and DCENR’s RES-E target

In the first instance, we wish to remind Clare County Council of Ireland’s need to support renewable energy, which also stems from its EU commitments, namely the EU Directive 2009/28/EC on the Promotion of Renewable Energy Sources. The Directive, which came into force in April 2009, established a binding target of 20% of overall EU energy consumption coming from renewable sources by 2020, as well as a binding 10% minimum target for energy from renewable resources in the share of transportation fuels. Ireland’s target under the Directive is for renewable resources to account for 16% of total energy consumption by 2020. Failure to meet these targets could result in EU sanctions. In line with these commitments, DCENR announced a renewable electricity target (RES-E) of 40% by 2020.

The European Union is currently in the process of agreeing the framework for a further series of targets for renewable energy towards 2030, and in October 2014, Ireland agreed to new EU 2030 targets which seek a 40% reduction in Green House Gas (GHG) Emissions and a binding EU target for renewable energy of “at least 27%”.

1.2 Benefits of Wind Energy Development to Clare County Council

As the vast majority of new renewable capacity will be provided by onshore wind, the 40% target is a significant challenge for the Irish wind industry as a whole. An approximate doubling of wind capacity will need to be installed onshore in Ireland within the coming years if we are to meet our 2020 RES-E target. In this context, we wish to emphasise that the current installed wind energy capacity of approximately 50 MW in County Clare, provides clear room for positive progress towards the ambition stated within the County Wind Energy Strategy. The expansion of the Irish wind industry will be an extremely positive economic development for Clare County Council and can result in job creation, Local Authority rates and development contributions, and a reduction of GHG emissions.

1.3 The Promotion of Renewable Energy

IWEA welcomes Clare County Council's recognition in its Issues Booklet that *"in order to drive the County forward first class communications, energy and other infrastructure are needed."* In terms of the question regarding how the Development Plan should encourage renewable energy production and the use of alternative forms of energy, IWEA suggests that clear and target focused objectives and policies that demonstrate the manner in which renewable forms of energy are encouraged should be included in the document.

IWEA is cognisant of the fact that Clare County Council already has both a Wind Energy Strategy (2011-2017) and a Renewable Energy Strategy (2014-2020) and commends the Council for its foresight and commitment to renewable energy development, by implementing both of these plans.

IWEA recommends that any changes to these strategies should be mindful of EU and national energy policy as well as ensuring that the strategies are prepared in accordance with the SEAI document, *"A Methodology for Local Authority Renewable Energy Strategies"*.

The inclusion of specific policies and objectives in the new Plan that promote the further development of renewable energy will enable Clare County Council to:

- Develop a sustainable, wind energy industry employing construction and professional service providers and attracting significant capital investment;
- Enhance the vibrancy of the county as a renewable energy leader;
- Support rural development in a sustainable manner;
- Deliver significant community benefits including the reduction of energy prices and the provision of land lease payments to local landowners annually;
- Deliver significant commercial rates revenue to County Clare annually.
- Attract Foreign Direct Investment (FDI) from high-tech companies of the kinds which has recently seen Facebook invest in a 100% renewables powered data centre in Co. Meath and Apple who has recently announced its investment in a 100% renewables powered data centre in Co. Galway. This kind of clean energy based FDI constitutes a massive opportunity for Co. Clare due to the availability of abundant wind and renewable energy sources in the county.

1.4 Clare Wind Energy Strategy – Volume 5 of CDP 2017-2023

IWEA understands that the Draft 2017-2023 Clare County Development Plan (CDP) includes the current Clare Wind Energy Strategy (2011-2017) under Volume 5. In accordance with the requirements of the Department of Environment, Community and Local Government as set out in Circular PL20-13, the existing Clare Wind Energy Strategy (2011-2017) will operate in the Draft 2017-2023 Clare County Development Plan to provide the planning framework for wind energy in Clare until the various national policy review processes have concluded. These review processes include the *Wind Energy Development Guidelines* (The Department of the Environment, Communities & Local Government (DECLG)) and the *Renewable Electricity Policy and Development Framework* (The Department of Energy, Communications and Natural Resources (DCENR)).

1.5 IWEA Submissions to the Draft CDP & Clare Wind Energy Strategy

IWEA understands that the Local Authority will consider all submissions received during the draft consultation stage of the Draft County Development Plan, and that any issues raised with regard to wind energy policy will be addressed in the context of the requirement to comply with Circular PL20-13.

IWEA supports Clare County Council's objectives to maximise Ireland's renewable energy development potential in a sustainable and sensitive manner. IWEA recognises the potential progress which the application of these objectives may offer towards meeting National targets and local development. In this context IWEA wishes to support the Relevant Goals, Strategic Aims and Planning Objectives, as set out in the Clare Draft CDP 2017-2023.

1.6 Draft Clare County Development Plan 2017-2023 Goals & Strategic Aims

IWEA welcomes Clare County Council's positive position regarding renewable energy and its identification of wind as a key natural resource. Section 10.4 Natural Resources outlines how "Clare is a county rich in natural resources, the sustainable exploitation of which has the potential to contribute significantly to both the local and national economy"... "almost the entire county has either an excellent or very good wind energy resource". This is recognised as set out in the Vision for County Clare through several of its Strategic Goals, most notably:

"Goal I: A County Clare that drives local and regional growth by harnessing the potential of its unique location, quality of life, natural resources and other competitive advantages"

"Goal IX: A County Clare with diverse and strong rural communities and economy, where its natural resources are harnessed in a manner that is compatible with the sensitivity of rural areas and the existing quality of life".

"Goal XVIII: County Clare that is resilient to climate change, manages flood risk, facilitates a low carbon future, supports energy efficiency and conservation and enables the de-carbonisation of our lifestyles".

These Goals are consistent with the working target outlined in the Clare Wind Energy Strategy of 550 MW of wind energy capacity for County Clare, in order to enable the County to make the initial steps toward a low carbon economy by 2020. The Strategic Aims set out in Section 10.1 of the Development Plan, provide further detail on the wind energy sectors' current status and its potential contribution to the Strategic Goals, through sustainable development in an environmental context.

The Draft CDP outlines how "development and siting of wind energy projects must be balanced with the potential impacts on the landscape, ecology and the amenities of local communities. Areas that are considered suitable for commercial wind energy developments are set out in Volume 5 of this plan. There is also potential for other forms of renewable energy generation, such as anaerobic digestion and solar energy that can be integrated into both domestic and agricultural settings. These issues are set out further in Volume 6 of this (2017-2023) Plan. IWEA fully endorses this view, as we aim to promote the best practice in

project design, sustainable development, construction and operation in order further harmonise all aspects of the wind industry within its supporting environment.

1.7 Clare Draft CDP 2017-2023 Objectives:

Several references are made within the Draft Development Plan 'Objectives' to the ample wind resource in Clare and to its potential to contribute to both decarbonise and to contribute to the local economy in a number of different ways.

Section 10.4.4 The 'Renewable Energy' section outlines and identifies how *"there is significant potential for the development of renewable energy in County Clare. The county has one of the best wind resources in the world – almost the entire county has either an excellent or very good wind energy resource"*. IWEA applauds both the Authority's identification of this resource and the subsequent work provided within the Clare Wind and Renewable Energy Strategies to help develop it in a sustainable way.

In addition many of the Draft CDP Objectives outlined are cognisant of this fact and IWEA fully supports the Authorities' inclusion of wind energy throughout all of the relevant 2017-2023 Objectives. Some of these Objectives include:

CDP6.17 Development Plan Objective: Energy Supply

It is an objective of the development plan:

To contribute to the economic development and enhanced employment opportunities in the county by:

(a) Facilitating the development of a self-sustaining, secure, reliable and efficient renewable energy supply and storage for the county;

(b) Enabling the county to become a leader in the production of sustainable and renewable energy for national and international consumption through research, technology development and innovation.

CDP6.18 Development Plan Objective: Green Technology

It is an objective of the development plan:

(a) To support the development of low carbon and green tech businesses and industries throughout the county.

CDP8.37 Development Plan Objective: Electricity Networks

It is an objective of Clare County Council:

(a) To facilitate improvements in energy infrastructure and encourage the expansion of the infrastructure within the county;

(b) To facilitate future alternative renewable energy developments and associated utility infrastructure throughout the county;

(c) To collaborate with EirGrid, in accordance with the Grid25 Strategy, to facilitate the delivery of quality connection, transmission and market services to electricity

generators, suppliers and customers utilising the high voltage electricity system in County Clare;

(d) To collaborate with EirGrid over the lifetime of the plan to ensure that the county's minimum target of 966MW renewable energy generation is achieved and can be accommodated on the electricity network in County Clare;

(e) To have regard to environmental and visual considerations in the assessment of developments of this nature.

CDP8.39 Development Plan Objective: Renewable Energy

It is an objective of the development plan:

(a) To encourage and to favorably consider proposals for renewable energy developments and ancillary facilities in order to meet national, regional and county renewable energy targets, and to facilitate a reduction in CO2 emissions and the promotion of a low carbon economy;

(b) To assess future renewable energy-related development proposals having regard to the Clare Renewable Energy Strategy 2017-2023;

(c) To assess proposals for wind energy development and associated infrastructure having regard to the Clare Wind Energy Strategy and the associated SEA and AA, or any subsequent updated adopted Strategy;

(d) To prepare an updated Wind Energy Strategy for County Clare during the lifetime of this development plan;

(e) To strike an appropriate balance between facilitating renewable and wind energy-related development and protecting the residential amenities of neighboring properties;

(f) To support and facilitate the development of new alternatives and technological advances in relation to renewable energy production and storage, that may emerge over the lifetime of this Plan;

(g) To ensure that all proposals for renewable energy developments and ancillary facilities in the county are in full compliance with the requirements of the SEA and Habitats Directives;

(h) To promote and market the county as a leader of renewable energy provision.

CDP 10.11 Development Plan Objective: Renewable Energy Development

It is an objective of the development plan:

(a) To facilitate the development of renewable energy developments in rural areas in accordance with the adopted Clare Wind Energy Strategy and Renewable Energy Strategy and the associated SEA and AA (and any subsequent strategies).

IWEA supports all aspects of these 2017-2023 Draft CDP Objectives and is confident that they are consistent with the Clare Wind Energy Strategies working target of 550 MW of wind energy proposed to be harnessed in County Clare (Clare Wind Energy Strategy, Volume 5), to enable the County to make the initial steps toward a low carbon economy by 2020.

1.8 Co. Clare's Living Landscapes

Section 13.3 'Clare's Living Landscapes' of the Draft Clare CDP 2017-2023 recognises that areas that once supplied food are now needed to *"supply clean water, and as areas for recreation, tourism and education for increasingly urbanised communities in County Clare and elsewhere, while other areas are going to be used to provide employment and economic activity from agribusiness, forestry, wind energy and infrastructure"*.

IWEA applauds this foresight with respect to our changing landscape, economies and ways of life. IWEA is committed to driving the best industry practice through the planning stage, construction phase and operational phases of wind farms to ensure that they are a sustainable element of Clare's landscape.

IWEA agrees wholly with section 15.3.2 'Industrial Heritage' which encapsulates the dynamic way in which landscapes evolve, *"this evolution has continued, for example, from the motive power of early watermills through hydro-electric generation to newer wind energy developments"*.

1.9 Shannon Strategic Development Locations

IWEA applauds the Shannon Integrated Framework Plan and especially the development and zoning of the Strategic Development Locations (SDLs). IWEA would like to take this opportunity to propose that the SDLs could have the potential to be extended and that possible other locations could be accessed for potential SDL suitability. IWEA is of the opinion that these SDLs present the opportunity for wind energy development. The Moneypoint wind project being an excellent case in point. Furthermore, the infrastructure associated with wind projects in and around SDLs may benefit future renewable projects in the estuary area, as outlined in the Clare Renewable Energy Strategy (RES 2014-2020).

1.10 Conclusion

IWEA welcomes the opportunity to contribute to the Draft 2017-2023 Clare County Development Plan within which Goals, Strategic Aims and relevant Objectives outline and describe the support from Clare County Council for the continued development of the wind and renewable energy resource in the County. We appreciate the existing support within the current CDP for the development of the county's wind and renewable energy resource, and would call for this support to be maintained and further developed.

The proactive approach taken by Clare County Council in the new County Development Plan will further the County's potential to realise the development target of 550MW of wind for the County to be developed in a sustainable way by 2020 (Clare RES 2014-2020) and will support the potential expansion of this target post 2020 where appropriate.

IWEA recognises the potential progress which the application of these Objectives may offer towards meeting Local and National targets. IWEA wishes to reiterate our commitment to driving best industry practice through the planning stage, construction phase and operational phases of wind farms to ensure that they are a sustainable element of Co. Clare's economy and its contribution to the implementation of the National Renewable Energy Action Plan (NREAP) as required by EU Directive 2009/28/EC. IWEA supports Clare County Council's Draft Objectives to maximise renewable energy development potential in a sustainable and sensitive way.

IWEA would welcome the opportunity to meet with the Forward Planning Section to discuss our response in more detail. We thank you for the opportunity to contribute at this stage of the consultation process and we look forward to contributing further as the strategic plan progresses.