Irish Wind Energy Association,
Sycamore House,
Millennium House,
Osberstown,
Naas, Co. Kildare.

Senior Planner, Planning Section
Laois County Council
Aras an Chontae,
JFL Avenue,
Portlaoise,
Co. Laois

By email to cdp@Laoiscoco.ie

13th October 2016

Re: Submission to the Preparation of the Draft Laois County Development Plan 2017-2023

Dear Co. Laois Forward Planning Team,

The Irish Wind Energy Association (IWEA) welcomes the development of the **Draft Laois County Development Plan 2017-2023** as a strategic planning framework for the county. This submission follows on from our previous submission to the pre-draft stage consultation dated 4th December 2015.

IWEA is Ireland's leading renewable energy representative body and as such has an active interest in the potential for renewable energy, and in particular wind energy in County Laois. As the proposed amendments to the County Development Plan will inform the vision, objectives and policies for the entire county, IWEA would like to make the following comments which we request the planning authority take into consideration in the finalisation and adoption of the Development Plan.

IWEA is extremely concerned in relation of some of the proposed provisions of the CDP and we would question why wind energy is being targeted in a way which stands in direct conflict with National Wind Farm Planning Guidance. IWEA is clear that a setback distance from wind energy of 1.5km as is proposed effectively sterilises the county for future wind energy development, allied with this, we can see the complete removal or reclassification of a number of areas deemed suitable for wind energy development in the Current Laois County Development Plan, 2011-2017 (Current CDP).

We very much welcome this opportunity and look forward to engaging constructively with you in the future, we would also welcome the opportunity to discuss this submission in more detail at any stage.

Yours Sincerely,
*Sent by email.

_____

Stella Burke
Irish Wind Energy Association

EU & National Renewable Energy Commitments

It is important we must recognise Ireland's obligation and our need to support renewable energy as set out under EU Directive 2009/28/EC on the Promotion of the Use of Energy from Renewable Sources, which establishes a binding target of 20% of overall EU energy consumption to come from renewable sources by 2020. Ireland's mandatory target under Directive 2009/28/EC is for renewable sources to account for 16% of total energy consumption by 2020. Ireland's National Renewable Energy Action Plan sets out how Ireland intends to achieve this binding national renewable energy target of 16% with renewable electricity (RES-E) to account for 40% of total energy consumption by 2020.

In Autumn 2014, Ireland agreed to new binding EU 2030 energy targets, which proposes to achieve a 40% reduction in greenhouse gas emissions by 2030 relative to 1990 and a binding EU wide target for renewable energy of at least 27% by 2030. These targets require that renewable energy will be a critical and growing component of Ireland's energy supply to 2020 and beyond. Failure to meet these binding targets will result in EU sanctions.

Climate Change Policy & Targets

At the Paris climate conference (COP21) in December 2015, 195 countries including Ireland adopted the first-ever universal, legally binding global climate deal. The agreement sets out a global action plan to put the world on track to avoid dangerous climate change by limiting global warming to well below 2°C above pre-industrial levels and to limit the increase to 1.5°C. Under the agreement Governments also agreed on the need for global emissions to peak as soon as possible, recognising that this will take longer for developing countries, and to undertake rapid reductions thereafter in accordance with the best available science. Ireland has signed the Paris Agreement with national ratification expected.

The International Panel on Climate Change (IPCC) has put forward its clear assessment that the window for action on climate change is rapidly closing and that renewable energy sources such as wind will have to grow from 30% of global electricity at present to 80% by 2050 if we are to limit global warming to below 2 degrees in accordance with the COP 21 Agreement.

It is within this context that the Government enacted the 'Climate Action and Low Carbon Development Bill 2015' which provides for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a low carbon, climate resilient and environmentally sustainable economy.

Progress towards National Renewable Energy 2020 Targets

As we are now less than 3.5 years from 2020 we can begin to have a significant amount of confidence in projecting the likely energy demand requirements in 2020 from current energy trends. One overriding and ultimately positive trend is that Ireland's economy is growing at the highest rate in Europe, over 7% GDP growth per annum. The Economic and Social Research Institute (ESRI) noted that from an initial export led growth, there is now an increase in domestic consumption. This will

manifest across all areas of energy use. The energy modelling group at the Sustainable Energy Authority of Ireland (SEAI) recently produced a report[1] for policymakers, stating that:

> '*It is evident that an increased deployment rate of all renewable electricity technologies is required in order to meet the 2020 renewable electricity (RES-E) target*'.

The renewable heat (RES-H) sector is expected to have an estimated shortfall in targets by around 3-5% of the overall 12% RES-H targets by entities such as University College Cork (UCC), ESRI and SEAI. The transport sector is also estimated to have a shortfall on its 10% target (RES-T). To compound this the most recent EirGrid 'All Island Generation Capacity Statement 2016-2025[2]', estimates that between 3.8-4.1GW of wind energy could be required to meet the 2020 RES-E target. To achieve this EirGrid estimates that this would mean an average of about 300MW of extra wind capacity installed per year between now and 2020. The increase in electricity demand is largely being driven by an increased data centre demand (from the likes of Apple, Google, Facebook, Amazon etc. who have a need for 100% renewable electricity) and the current economic recovery in Ireland.

The consequence of potentially not meeting our 16% renewable energy target is that Ireland will either have to purchase renewable credits from other EU states through statistical transfer surplus or alternatively the European Court of Justice will apply fines to Ireland. According to estimates by the Department of Communications, Energy and Natural resources[3] (DCENR) the cost to Ireland of missing the 2020 targets in the range of 1% - 4% will be in the range of €140m and €600m per year of non-compliance.

Given that 2030 targets are expected to be set at a more challenging level than 2020, the fines could persist for an extended number of years, and so the total cost to Ireland could run to billions. For comparison, the entire wholesale electricity market has an annual value of around €3bn. Recognising the scale of this risk, the Department of Finance noted in its April 2016 Stability Programme Update[4]:

> '*There are fiscal risks associated with a legally binding EU Effort Sharing Decision on climate change covering the 2013-2020 period. Ireland is obliged to achieve a 20 per cent Greenhouse Gas emissions reduction (compared to 2005 levels) in certain sectors. Current EPA projections estimate that Ireland will not achieve this reduction and failure to comply may incur costs of hundreds of millions through the purchase of carbon credits until such time as the target is complied with. Similarly, further new costs may arise in the context of a new EU climate and energy framework for the period 2020-2030, which will set new emissions reduction targets*.'

---

[1] https://www.seai.ie/Publications/Statistics_Publications/Energy_Modelling_Group_Publications/Ireland%E2%80%99s-Energy-Targets-Progress-Ambition-and-Impacts.pdf

[2] http://www.eirgridgroup.com/sitefiles/library/EirGrid/Generation_Capacity_Statement_20162025_FINAL.pdf

[3] http://igees.gov.ie/wp-content/uploads/2013/10/Future-Expenditure-Risks-associated-with-Climate-Change-Climate-Finance1.pdf

[4] http://www.finance.gov.ie/sites/default/files/SPU_FINAL_post_Oireachtas_0.pdf

Security of Energy Supply

Ireland is one of the most energy import-dependent countries in the European Union, importing 85% of its fuel in 2014[5]. This makes Ireland particularly vulnerable to future energy crises and price fluctuations given its location on the periphery of Europe. The international fossil fuel market is growing increasingly expensive and is increasingly affected by international politics which can add to price fluctuations. This volatility will be increased as carbon prices increase in the future. The cost of carbon credits is included in all electricity traded, and the price of electricity generated by coal is particularly vulnerable due to its high carbon emissions per unit of electricity generated.

In December 2015 the Government confirmed in their publication of the White Paper 'Ireland's Transition to a Low Carbon Future 2015 – 2030' that '*there will be a substantial increase in the cost of carbon in the short and medium term, through the EU Emissions Trading Scheme'*. Any steps to reduce dependence on imported fossil fuels will add to financial autonomy and stability in Ireland. The White Paper also notes, '*In the longer term, fossil fuels will be largely replaced by renewable sources'*. SEAI has recently warned of our heavy dependence on imported fossil fuels, noting '*In 2014, 15% of our energy came from indigenous resources with renewable energy now starting to make a significant contribution. However, the remaining 85% of our energy requirements came from abroad, costing us more than €15 million every day. This is a lost opportunity in terms of keeping this money here in Ireland and further developing our abundant renewable resources*.'

Competiveness of Wind Energy and Local Benefits

While Ireland has a range of renewable resources, as the White Paper states *'[Onshore Wind] is a proven technology and Ireland's abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries. This results in a lower cost of support*.'

A 2015 Poyry study 'Future Wind Scenarios and Electricity Market Effect in Ireland' showed that reaching our RES-E target in 2020 would reduce wholesale prices by more than costs of (i) new grid infrastructure, (ii) backup required when the wind doesn't blow and (iii) the subsidies paid to wind generators. Poyry found that meeting the RES-E target would result in a net saving of €43m per year to the Irish economy from 2020. The EU has noted that Ireland has one of the lowest costs of supporting renewables, mainly because onshore wind is on a par with the cost of power from conventional generation when a full cost benefit is undertaken. Wind energy brings with it significant local benefits by way of local jobs, rental payments to landowners, rates to county councils and improved infrastructure such as roads.

[5] https://www.seai.ie/Publications/Statistics_Publications/Energy_Security_in_Ireland/Energy-Security-in-Ireland-2015.pdf

Specific Comments on the Draft County Development Plan & Wind Energy Strategy, 2017-2023

As a major stakeholder in the wind energy sector, IWEA welcomes the Council's statement in the Draft Laois County Development Plan, 2017-2023 (Draft CDP) to prepare a Renewable Energy Strategy during the lifetime of the Plan and approves of the policy measures in Volume 1, Written Statement, Section 6.6.1.4 Wind Energy as follows:

> *'EN1 Encourage and favourably consider proposals for renewable energy developments and ancillary facilities subject to compliance with normal planning and environmental criteria; 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, and in compliance with Article 6 of the Habitats Directive;*
>
> *EN3 Promote and facilitate wind energy development in accordance with Guidelines for Planning Authorities on Wind Energy Development (Department of Environment, Heritage and Local Government, 2006) and the Wind Energy Strategy which forms part of this Plan, and subject to compliance with normal planning and environmental criteria;* and
>
> *EN4 Promote and encourage the development of energy from renewable sources such as hydro, bioenergy, wind, solar, geothermal and landfill gas subject to compliance with normal planning and environmental criteria and the development management standards contained in Section 8.'*

IWEA is, however, discouraged by the lack of support and promotion of renewable energy sources in the Draft CDP Core Strategy and has a serious concern with the policy measure proposed in Volume 1, Written Statement, Section 6.6.1.4 Wind Energy as follows:

> *EN7 Ensure a setback distance of 1.5 km of Wind turbines from schools, dwellings, community centres and all public roads in all areas open for consideration for wind farm development'.*

This policy measure of a set-back distance of 1.5 km is entirely contradictory to EN1, EN3 and EN4 and, as detailed herein, it will **sterilise the entire county** from any further wind energy development, ruling out locations where wind energy development could otherwise be entirely acceptable from an environmental and planning perspective.

The Draft Laois Wind Energy Strategy, 2017-2023 (Draft WES) proposes the **complete removal** or **downgrading** in classification of a number of areas deemed 'Preferred' or 'Open for Consideration' in the Current Laois County Development Plan, 2011-2017 (Current CDP). IWEA is extremely concerned at the negative approach to wind energy development in the county and the detrimental

impact this measure will have on the viability of not only future projects, but projects that are currently at an advanced pre-planning stage within the county.

Circular Letter PL 20-13 advised local authorities to defer amending their existing Development Plan policies relating to wind energy until such time as the review of the current Department of the Environment, Heritage & Local Government Wind Energy Development Guidelines, 2006 (DoEHLG Wind Energy Guidelines) is completed. Planning authorities are required to have regard to guidelines issued under Section 28 of the Planning and Development Act 2000 in the performance of their functions. The DoEHLG Wind Energy Guidelines were issued under Section 28 of the Act and although being reviewed in part they have not been rescinded, withdrawn or updated at the time of writing. Laois County Council is therefore acting in direct contravention of its national and regional obligations by proposing revisions to its wind energy policy.

Specific Issues with the Draft Wind Energy Strategy 2017-2023

The strategy recognises that '*Ireland is currently extremely vulnerable both in terms of meeting future energy needs and ensuring price stability*' and acknowledges that '*the challenges of climate change resulting from increasing greenhouse gas emissions needs to be tackled effectively, strategically and urgently*'.

Sterilisation of Landscape

Development Control Standards

Buffer Zones

In addition to policy measure EN7, Section 6 of the Draft WES reiterates the proposed 1.5km setback distance from turbines as follows:

> *'Ensure a setback distance of 1.5km of wind turbines from schools, dwellings, community centres and all public roads in all areas open for consideration for wind farm development'.*

Volume 1 Written Statement, Section 6.6.1.4 specifically states:

> '*the Council will have regard to the Wind Energy Development Guidelines for Planning Authorities (DEHLG, 2006) in relation to the siting and development of wind turbines and the information required as part of the planning application*'.

The proposed 1.5km setback distance is undoubtedly contrary to the above statement and grossly out of step with the current 500m setback distance as set out in the DoEHLG Wind Energy Guidelines. These guidelines are intended to afford adequate residential protection, ensure a consistency of approach throughout the country and to not place undue restrictions on developers which is the stated key objective of the Guidelines. Furthermore, the Draft WES ignores the requirement as set out within Section 3.1 of the DoEHLG Wind Energy Guidelines for a reasonable balance to be achieved between Government Policy and Local Proper Planning considerations as follows:

'The development plan must achieve a reasonable balance between responding to overall Government Policy on renewable energy and enabling the wind energy resources of the planning authority's area to be harnessed in a manner that is consistent with proper planning and sustainable development.'

Planning authorities are required to have regard to national policy and guidance when considering matters such as setback distances and should not seek to set individual setbacks which effectively restrict development in their individual functional areas.

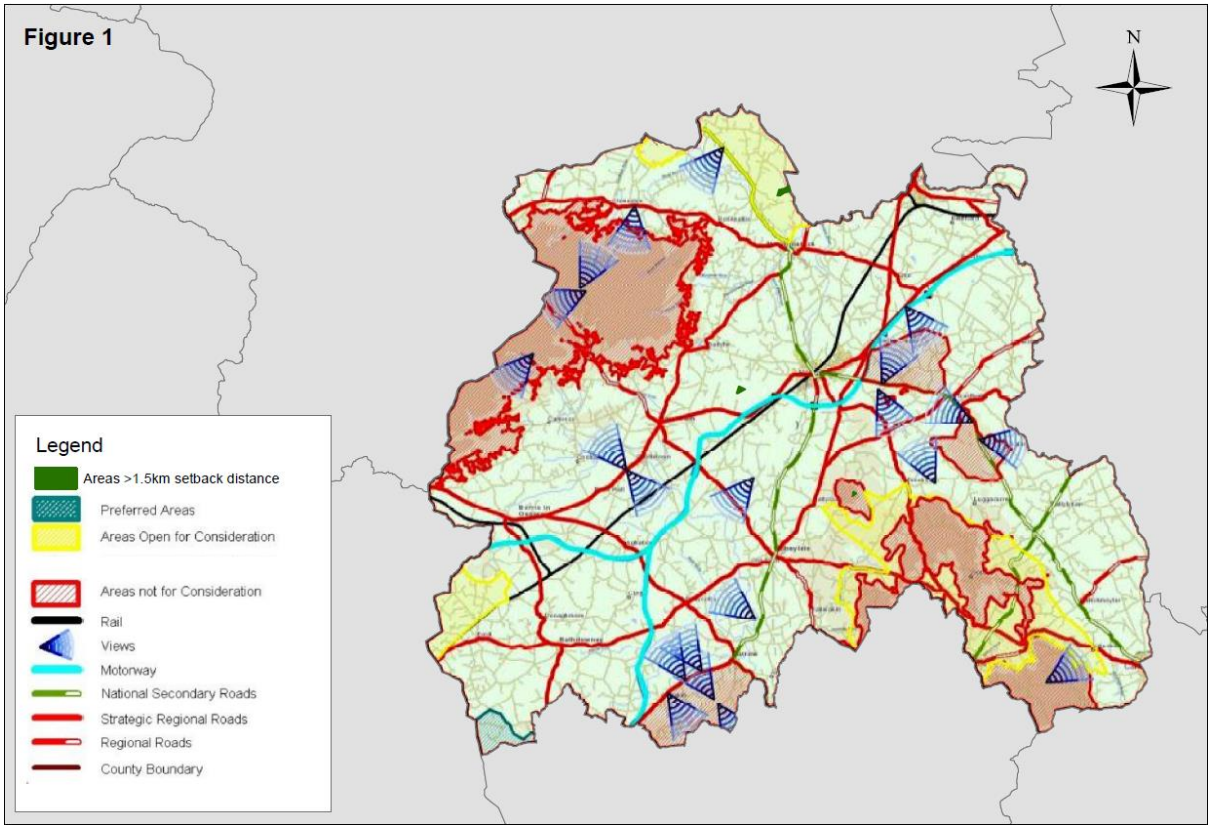
IWEA questions whether the application of the proposed 1.5km setback has been assessed in a GIS land mapping context in the drafting of this policy and whether the true ramifications of this measure on wind energy development have been adequately comprehended? IWEA has carried out its own assessment of the serious impact of this proposed 1.5km setback distance. Figure 1 illustrates that a minute 0.02% (areas indicated in green) of the 'Areas Open for Consideration' will be left available for wind energy development. IWEA considers that this clearly does not support the promotion of renewable energy developments, including wind energy, in Co. Laois. It removes the requirement for a Wind Energy Strategy for County Laois by sterilising all lands within the county, irrespective of the suitability of the landscape character and its classification as 'Preferred' or 'Open for Consideration' in the WES.

IWEA would also like to note the analysis in Figure 1 is based on setback distance only and does not take into consideration other constraints such as viable wind resource, land availability, cumulative impacts with other wind farms, environmental buffers etc. which, when applied, would further reduce the already minute area available for development.

It is worth pointing out that in July 2016, the neighbouring County of Kildare issued a consultation on their Draft CDP 2017-2023 which did not recommend a setback distance above that of the DoEHLG Wind Energy Guidelines. In 2014, Roscommon County Council proposed a setback distance greater than the current 500m distance which had a Ministerial Direction issued against it and the proposal subsequently removed.

IWEA strongly rejects the proposed 1.5km setback distance. It is clearly uninformed and lacks justification with no quantitative study presented in the Draft CDP or WES. The proposal contravenes national and government policy and guidance, Circular Letter PL20-13 and is not in line with the policy measures of the Draft CDP, specifically EN3 which states that Laois County Council will '*facilitate wind energy development in accordance with Guidelines for Planning Authorities on Wind Energy Development (Department of Environment, Heritage and Local Government, 2006)'.*

Figure 1 **Impact of 1.5km Setback Distance**



Ancillary Structures and Equipment

Section 6.12 of the Draft WES states '*all wind monitoring masts require planning permission'.* IWEA wishes to note that while planning permission is required for most elements of a wind farm development there are some developments which are (normally) exempt from planning. These include temporary met masts with a total height not exceeding 80m and being erected for a maximum of 15 months within a 24-month period. Refer to SI 235, Planning and Development Regulations Amendment 2008. **IWEA requests that Laois County Council review this proposal in light of the above Regulations.**

Landscape Character Types

The original Landscape Character Assessment (Current LCA) for the County of Laois was undertaken and published as a supporting document to the Current CDP in 2011. The LCA was undertaken to classify and describe the landscape of County Laois, providing an evidence based characterisation of the county's landscape components, the process of which was to assist in consistent decision making, in order to achieve a balance between the protection, management and planning of the landscape. Seven different Landscape Character Types (LCT) for the County are identified with three of these LCT's considered for wind energy development namely LCT 1: Hills and Upland Areas, LCT 5: Peatland Areas and LCT 7: Rolling Hills Areas. To a lesser extent, certain undesignated peatlands are identified as 'Preferred' for wind energy development.

Draft Appendix 6 LCA and Map 6 sets out the 7 different LCT's within County Laois. The policies, recommendations and extent of these LCT's all remain unchanged from the Current LCA. Please refer to Appendix I.

The Draft WES sets out policy in relation to the LCT's considered for wind energy development and as stated above, the policies, recommendations and extent of these LCT's remain unchanged from the Current CDP.

Hills and Upland Areas

The Current WES classifies part of the Hills and Upland Areas of County Laois as 'Open for Consideration' and 'Preferred' for wind energy development. The DoEHLG Wind Energy Guidelines provides guidance on the siting and design in landscape character types such as Hilly and Flat Farmland which relates to this LCT and the Draft WES advises that the siting and design principles of the DoEHLG Wind Energy Guidelines should be applied in relation to this LCT.

The wording in Section 4.5 of the Draft WES under the heading 'LCT 1: Hills and Upland Areas' specifically states '*The Wind Energy Strategy has identified these upland areas for consideration in terms of future wind energy development and states that any such development must be carefully sited to minimise negative impacts.'*

The reclassification of areas considered for wind energy development as proposed in Draft Map 1.6.5 is now inconsistent with the above text. The majority of the Hills and Upland Areas previously considered 'Preferred' or 'Areas Open for Consideration' for wind energy development due to their sparse populations, viable wind regime, avoidance of designations and relatively low sensitivity/some capacity to absorb wind development are now either reclassified as 'Areas Not for Consideration' or removed entirely from the Area Classifications. The altered methodological approach to these wind energy reclassifications should be outlined in the Draft WES to ensure accordance with existing national guidelines, however this is not provided. The Draft WES proposes these changes without any reasoning or new evidence base beyond the Draft WES stating '*having regard to the landscape character assessment policies, amendments have been made to the areas to reflect these policies'*. As stated above, the policies, recommendations and extent of the Hills and Upland Areas LCT remain unchanged from the Current CPD/WES so the reasoning for these reclassifications are unfounded.

IWEA supports proper planning and development and questions the restrictive move to reduce viable wind energy development in the Hills and Upland Areas - areas which largely coincide with the elevated areas of the county and which are identified as areas for wind energy development in the Current and Draft WES. Additionally, when the proposed 1.5km setback is considered, there are no areas available for future wind energy development within LCT 1: Hills and Upland Areas. This is further incompatible with the Current and Draft WES classifications and would render the selection of a wind energy site in Laois as geographically impossible.

Peatland Areas and Lowland Agricultural Areas

In the central portion of County Laois, the Landscape Character Types of Peatland Areas and Lowland Agricultural Areas are classified as 'Preferred' in the Current WES. National guidance provides guidance on the siting and design of wind energy developments on these landscape character types which is best described as Flat Peatland or Hilly and Flat Farmland in the DoEHLG Wind Energy Guidelines. The Draft WES proposes to remove the 'Preferred' classification of these lands without reasoning or any proposal to identify the potential of this lands under any alternative classification.

The Lowland Agricultural Area covers the largest proportion of County Laois and is comprised primarily of pastoral and tillage agriculture. It is generally a flat open landscape with an enclosed character with well-treed road corridors, dense hedgerows, parkland and areas of woodland. There are no protected views or prospects within the portion of lands designated as 'Preferred' in the Current WES.

The character of Peatlands is described in the Landscape Character Assessment as strikingly flat and landcover is raised bog much of which is now exhausted and being considered for alternative uses including afforestation, amenity and wind energy. Section 7.18 of the Draft CDP Written Statement sets out the following policy measure specifically in relation to LCT 5 Peatland:

> *NH36 Support the identification of projects that have the potential to achieve commercial value such as industrial developments, renewable energy, tourism developments etc. while at the same time promoting high environmental standards and supporting Biodiversity objectives.*

Again, IWEA believes this policy cannot be implemented to support renewable energy development when Peatland areas deemed 'Preferred' in the Current WES are undesignated and removed from the Area Classifications in the Draft WES. In addition, when the proposed setback distance of 1.5km is applied to 'Areas Open for Consideration', only a miniscule part of LCT 5: Peatland Areas is available for potential wind energy development. This stands contrary to Policy NH36.

Rolling Hills Areas

LCT 7: Rolling Hills Areas are presented in the Draft WES as a LCT considered for wind energy development. When the proposed setback distance of 1.5km is applied there are no areas available for potential wind energy development in this LCT.

Adjoining County Strategies

Section 4.11 'Wind Energy Strategies in Adjoining Counties' states that wind energy strategies from Counties Carlow, Kildare, Kilkenny, North Tipperary and Offaly were examined as part of the methodology and the areas within those counties identified as being favourable towards wind energy development immediately adjoining County Laois are highlighted. IWEA would like to point out that these areas are no longer highlighted in Draft Map 1.6.5.

The Current WES represents a clear link between the LCT's considered for wind energy development and the Wind Energy Area Classifications however this link is clearly broken in the Draft WES. As detailed above the **removal** and **downgrading** in classification of area previously considered for wind energy development is proposed without justification or any new evidence base.

IWEA requests the Wind Energy Area Classifications revert to the existing and Current WES which represents a consistent methodology and approach to wind energy development while also complying with the requirements of strategic national policy and guidelines.

Incoherent Mapping with the Wind Energy Strategy Methodology

The landscape of County Laois currently holds areas that are 'Preferred', 'Open for Consideration' and 'Not for Consideration' to wind energy development. These area classifications and their geographical locations within County Laois are discussed further below.

The methodology surrounding the selection and classification of lands considered for wind energy development is clearly outlined in Sections 4 and 5 of the Current WES and repeated in Sections 4 and 5 of the Draft WES. The classifications of lands for wind energy development encompass the following considerations:

- Wind Resource Mapping
- Transmission Network/Grid proximity
- Settlement Patterns
- Designated Areas
- Landscape Character Types
- Views and Prospects
- Archaeology
- Recreation, Tourism and Amenity
- Landslide Susceptibility
- Wind Energy Strategies in Adjoining Counties

This methodology is aligned with the approach taken by a range of local authorities when considering and drafting a Wind Energy Strategy for their county and in the past was also adopted by Laois County Council in the preparation of their original and Current WES.

However, Laois County Council in their Draft WES are now proposing to significantly reclassify lands previously considered for wind energy development through the use of **incoherent mapping with the WES methodology**. This is presented in Map 1.6.5 of the Draft WES and is proposed without any new evidence or basis as detailed below.

The Landscape Character Assessment, 2011-2017 for County Laois remains unchanged in the Draft CDP. Designated Views and Prospects as seen in Map 1.7.11 of the Draft CDP remain unchanged from the Designated Views and Prospects identified in the Current CDP signifying that these View and Prospects are once again considered sympathetic and aligned with the View and Prospects of

the County. No further areas within Laois have been identified as sensitive or evolving into an increasingly sensitive area.

County Laois in their Draft CDP hasn't incurred any changes in relation to International, European or National ecological designations. Such changes can often influence the reclassification of designated wind energy areas to ensure the application of European legislation is addressed at a county level. Primary ecological and heritage sensitivities such as Special Projection Areas (SPA), Special Areas of Conservation (SAC) and Natural Heritage Areas (NHA) are afforded to a range of sites in County Laois and currently shape the existing wind energy classifications. These designations lend no reasoning to the extensive changes proposed in Map 1.6.5 for the Draft WES.

The detail provided in the Draft WES in relation to wind resource mapping, proximity of lands to a grid connection, archaeological monuments and landslide susceptibility all remain effectively unchanged from the Current WES, whilst settlement patterns from 2012 remain similar to settlement patterns in 2016.

It does not accord that an unchanged landscape in relation to its character, views and prospects, ecological designations and sensitivity should be subjected to such a dramatic reclassification as proposed in the Draft WES for lands which were previously considered for wind energy development. IWEA believes the methodology outlined in the Draft WES has not been applied to the final wind energy map (Map 1.6.5 'Wind Energy', in Appendix II).

The purpose of the WES is to assist the Planning Authority in taking a streamlined approach to wind energy planning applications and ultimately assist in the decision making process. If the Draft Map 1.6.5 is adopted, the re-classification of wind energy areas will result in an incoherent strategy for local authorities to work from and would be contrary to existing wind energy guidance.

IWEA requests that the discord between Sections 4 and 5 of the Draft WES and Map 1.6.5 is rectified to ensure that the correct methodology is adequately reflected in the final graphical representation of areas considered for wind energy development. An accurate application of this methodology is presented in the Current WES 'Wind Energy Strategy Map' and as such, is a more suitable instrument for local authorities and developers alike to evaluate the suitability of lands for wind energy development.

Wind Energy Area Classifications

IWEA understands that the Draft WES proposes to replace the existing 'Wind Energy Strategy Map' with Map 1.6.5 'Wind Energy'. Please refer to Appendix II, Section 6 and 'Map 1.6.5 Wind Energy' of the Draft WES subdivides Co. Laois into four distinct area classifications based on the suitability of the county to wind energy generation.

Strategic Areas

This classification remains unchanged from the Current WES, with no areas in the county identified as 'Strategic Areas' and deemed eminently suitable for wind energy development.

Preferred Areas

Four areas are identified as 'Preferred Areas' in the Current WES. The Draft WES seeks to significantly reduce these areas and limit the 'Preferred Areas' to one specific area of the county which is a former Bord na Móna cutaway bog near Rathdowney and in which six turbines are already operational. This one 'Preferred Area' constitutes a minor 0.5% of the land area of the entire county and as demonstrated in Figure 1, when the proposed setback distance of 1.5km is taken into consideration there are no areas available for development within the 'Preferred Area' classification. IWEA fails to understand how Laois County Council have identified this area as 'Preferred' when the proposed setback distance sterilises all wind energy development in this area.

There is no justification given in the Draft WES for the **complete removal** or **downgrading** of the wind energy area classifications for the remaining three 'Preferred Areas'. A significant portion of land running from the former Bord na Móna cutaway bog known as Cul na Móna between Portlaoise, Abbeyleix and Mountrath has been completely removed from the area classifications. The Current WES acknowledges that within this area '*turbines of minimum 100ms height would need to be utilised to harness the prevailing wind at these sites'*. However, no reasoning or new evidence base is given for the complete removal of this previously 'Preferred Area'. IWEA is extremely concerned that this area is proposed for removal without foundation and is not based on any objective assessment.

The remaining 'Preferred Areas' in the Current WES including Cullahill Mountain, Cullenagh Mountain near Ballyroan, extending eastwards to Luggacurren and Timahoe, southwards towards the Kilkenny border incorporating parts of The Swan, Wolfhill and Bilboa and westwards towards Spink and Ballinakill are all reclassified as 'Not for Consideration'. The downgrading in classification of these areas departs from the methodological approach outlined in both the Current WES and Draft WES and is proposed without any basis for areas of the county that are currently considered 'Preferred Areas' to wind energy development. The Current WES acknowledges that these areas are elevated and exposed with numerous coniferous tree plantations which offer some, albeit limited screening potential.

IWEA questions the negative approach to the reclassification of these areas due to the lack of justification and transparency provided and the Councils motivation for proposing these amendments where three out of four previously 'Preferred Areas' are now considered 'no go areas'.

IWEA strongly rejects this reclassification and requests that the 'Preferred Areas' in the Current WES remain.

Areas Open for Consideration

'Areas Open for Consideration' in the Current WES are described as '*areas that exhibit economically viable wind speeds, are sparsely populated, have some capacity to absorb wind development but which are sensitive enough to require a detailed site-by-site appraisal before any assumptions are made as to the suitability of the area* for development'.

The Draft WES proposes to reduce these areas from 14% to 8% of the county. This reduction is again due to the reclassification of two out of four areas previously identified as 'Areas Open for Consideration' to 'Areas Not for Consideration', which predominantly surround the previously 'Preferred' upland areas of Timahoe extending eastwards to Luggacurren, southwards to The Swan, Wolfhill, Bilboa and westwards towards Spink and Ballinakill.

The Current WES states '*applications in these areas will be treated on their merits with the onus on the applicant to demonstrate why the development should be granted permission*'. The Draft WES makes no such statement however states '*having regard to the landscape character assessment policies, amendments have been made to the areas to reflect these policies'*. This is the only reasoning provided for the reduction in the 'Areas Open for Consideration' and as stated above the policies, recommendations and extent of LCT 1: Hills and Upland Areas to which the above areas relate remain unchanged so the reasoning for these amendments is once again unfounded.

IWEA cannot see any justification or evidence for this reclassification and finds it difficult to understand on what basis it can be argued that these areas are no longer considered for wind energy development where the description for these Hills and Upland areas in the Draft WES contains the wording '*The Wind Energy Strategy has identified these upland areas for consideration in terms of future wind energy development and states that any such development must be carefully sited to minimise negative impacts'.*

IWEA questions how these reclassifications are in support of national and government policy for renewable energy development. IWEA is extremely concerned at this reclassification and the lack of evidence for it. **IWEA rejects this reclassification and requests that the 'Areas Open for Consideration' in the Current WES remain.**

Areas Not for Consideration

The Draft WES proposes to significantly increase the Current WES 'Areas Not for Consideration' from 10% to 18%. All of these additional areas have been identified in the Current CDP as either sparsely populated, have viable wind speeds or potential capacity to absorb wind energy development but which are sensitive enough to require a detailed site by site appraisal. Laois County Council have reclassified these areas without explanation. The EIA process is a well-established part of the planning process in assessing the individual merits of a wind farm application and is designed to

ensure that any potentially significant adverse effects are avoided or mitigated for each specific application and area.

IWEA rejects this reclassification and requests that Laois County Council review these reclassifications and allow the areas identified within the Current CDP to be assessed at a project specific level and justified where suitable through the EIA process, rather than being defined as "Areas Not for Consideration".

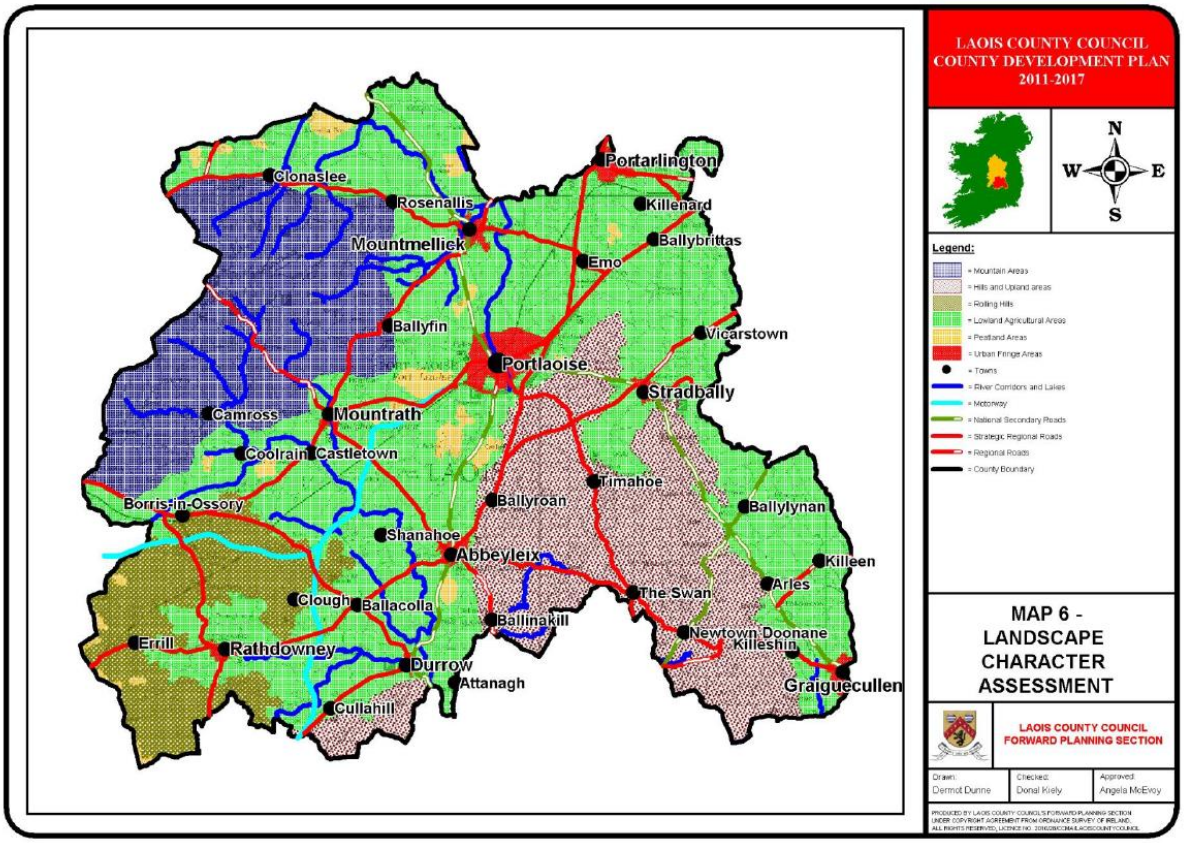
Conclusion

IWEA fully supports a nationally consistent and strategic approach to development. However as detailed above we **have serious concerns with the Draft Laois County Development Plan and Wind Energy Strategy, 2017-2023 which are in contrast to proper strategic planning and, if implemented, will sterilise all potential further wind energy development in the County of Laois.**

The Draft CDP and WES will unnecessarily and inappropriately terminate the implementation of European, National and Local policy to generate additional electricity from renewable sources which would otherwise satisfy the requirements of national policy and guidelines and the requirements of proper planning and sustainable development. IWEA would like to reiterate that wind energy is the most cost competitive, mature and readily available large-scale resource that can help Ireland meet its renewable energy targets.

IWEA rejects in the strongest manner the proposals of Laois County Council in relation to increased setback distance and the significant reclassification of areas previously considered for wind energy development. We request Laois County Council to review and take into consideration all of our comments and views in this submission. We remain firmly of the view that Laois County Council are in contravention of both National Guidelines and Government Policy in relation to renewable energy policy, undermining Irish climate change targets and the DoEHLG Wind Energy Guidelines which are currently under review and which have not been rescinded, withdrawn or updated at the time of writing. The Wind Energy Guidelines are intended to ensure a consistency of approach throughout the country and not to place undue restrictions on developers which is the stated key objective of the Guidelines.

Appendix I Landscape Character Assessment Extracted from the Draft Laois Wind Energy Strategy (2017-2023)



Appendix II: Comparison of the Current Laois Wind Energy Strategy (2011-2017) with the Draft Laois Wind Energy Strategy (2017-2023)