



BY EMAIL ONLY
planreview@wicklowcoco.ie
Forward Planning Section
Planning & Environment
Wicklow County Council

Innogy Renewables Ireland Ltd

Contact: Peter LeFroy
E: peter.lefroy@innogy.com
W: www.innogy.com

Friday 10th January 2020

County Development Plan Review – Wicklow County Development Plan 2021- 2027, Issues Paper

Dear Sir / Madam,

Thank you for providing Innogy Renewables Ireland Ltd the opportunity to contribute and respond to the above Issues Paper. Innogy Renewables Ireland Ltd (IRIL) was established in 2016 and is owned by innogy SE, a leading European energy company, with revenue of around €36.9 billion (2018), more than 42,900 employees and activities in 15 countries across Europe including Ireland. innogy has a current renewable generation capacity of over 3.9GW, including over 1.9GW of onshore wind and over 1GW of offshore wind, producing over 9.6 billion kWh per annum, across ten European Countries. innogy has recently expanded into new European and global markets, including, Ireland, the USA, Australia and Asia.

In Ireland, innogy are active in the development of our onshore and offshore wind and battery storage projects pipeline. innogy currently operate a 10MW windfarm at Dromadda Beg in County Kerry and we are in the process of growing our onshore wind pipeline to include new greenfield developments, consented sites and operational wind farms. In March 2018, innogy acquired an equal share in the ca. 600MW Dublin Array Offshore Wind Farm Project, partnering with another Irish company, Saorgus Energy.

With regards to the Wicklow County Development Plan Issues Paper, within the Climate Change, Flooding and Coastal Zone Management section, we are responding to the following question which was posed;

- **How do you think the County Development Plan can address climate change?**

We welcome and recognise the leadership of Wicklow County Council (WCC), the first Irish Local Authority to declare a biodiversity and climate change emergency in 2019. The County Development Plan should consider and address climate change through every aspect of its decision-making process as this is considered to be the greatest challenge facing our generation. As has been set out in the Issues Paper, climate change is a cross-cutting issue and all future policies and decisions must consider the current and future potential for climate -change mitigation and adaptation.

The revised County Development Plan can address climate change through a forensic approach to

ensure the reduction of carbon emissions through every aspect of its decision-making process as well as providing a supportive and clear plan for the sustainable development of new renewable energy generation projects. As well as the development of a Renewables Energy Strategy, we would welcome the revised County Development Plan setting out how it will meet and report upon the commitments set out in the Climate Action Charter and demonstrate continued leadership through the early implementation of the Offshore Renewable Energy policies as set out in the consultation draft of the National Marine Planning Framework.

Amongst other actions the County Development Plan can address climate change with the inclusion of the following three key actions which support the development of new renewable energy generation sources;

Action #1: Policy Actions implementing the Commitments as set out in the Climate Action Charter

We welcome the most recent commitments, as set out in the Climate Action Charter (signed by all Local Authorities and the Minister for DCCA and Housing (on 29th October 2019) that (in addition to many other commitments specified in the Charter), local authorities will:

- (d) implement, in so far as is practicable, measures which reduce our carbon emissions in line with national objectives, and develop a method for planning and reporting on these actions;
- (e) deliver a 50% improvement in energy efficiency by 2030 (on the 2009 baseline); and
- (f) ensure that policies and practices at local government level lead us towards low carbon pathways and put in place a process for carbon proofing major decisions, programmes and projects on a systematic basis, including investments in transport and energy infrastructure moving over time to a near zero carbon investment strategy.

We note that the Office of the Planning Regulator has written to Local Authorities within the Eastern and Midlands Regional Assembly advising them to maximise the output of renewable energy sources in line with national government policies on climate change and we agree with the sentiments expressed - we would welcome a regional Renewable Energy Strategy in the short term to ensure consistency across the region, as well as reducing duplication of effort. In the absence of such a regional plan, we support the development of a Renewable Energy Strategy for WCC, to support the strategic objectives of the transition to low carbon and clean energy, increase awareness of climate change and how to best mitigate its impacts, as well as enabling WCC to fully benefit from the economic opportunities that will be available through the transition to a lower carbon society.

As part of the review by Wicklow of its County Development Plan, we would urge the Council to ensure the economic and carbon reduction potential of renewables, (including on and offshore wind) is reflected in all future policy decisions and procedures (especially the onshore elements of offshore windfarms such as cable landfall and the onshore grid connection and harbour infrastructure required to facilitate the project).

Action #2: Policy Statements clearly implementing the National Planning Framework and the Regional Spatial and Economic Strategy as its relates to new renewable energy generation projects

The Wicklow County Development Plan must be consistent and support the delivery of the National Planning Framework's National Strategic Outcomes and the 16 Regional Strategic Outcomes. The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region (operational since June 2019), is underpinned through the three principles of Healthy Placemaking, Climate Change and Economic Opportunity. As the RSES states, a key challenge facing the Region, along with all other regions, is the transition to a low carbon society – and we welcome the recognition that renewable energy is one of the five primary areas highlighted. The RSES makes clear that „The Strategy supports an increase in the amount of new renewable energy sources in the Region. This includes the use of wind energy – both onshore and offshore, biomass, and solar photovoltaics and solar thermal, both on buildings and at a larger scale on appropriate sites in accordance with National policy and the Regional Policy Objectives outlined in this Strategy“.

As set out in the National Climate Action Plan (CAP) 2019, the Government has set out an ambitious target for 70% of Ireland's final demand to come from renewable energy by 2030. This will include almost a doubling of the onshore wind capacity as well as delivering 3.5GW of offshore wind from almost zero within 10 years. Whilst challenging, the economic and climate benefits of this transition will be significant.

We would urge WCC to develop a Renewable Energy Strategy for the County that incorporates the methodologies outlined in the SEAI Local Authority Renewable Energy Strategy (LARES) as indicated in the current Plan, the current Wind Energy Development Guidelines (2019) and any future guidelines adopted. We would encourage WCC to discontinue the current position of placing landscape classification above all other criteria. This would support a regional strategy approach to identifying potential wind development sites across the region.

Action #3: Policy Actions supporting implementation of the draft and final National Marine Planning Framework

The National Marine Planning Framework (NMPF)(consultation draft published November 2019) is a parallel document to the National Planning Framework. The National Planning Framework with the National Development Plan sets the context for each of Ireland's three regional assemblies in developing their Regional Spatial and Economic Strategies, taking account of and coordinating, local authority County and City Development Plans in a manner that will ensure national, regional and local plans align. In accordance with the requirements as set out in the Planning and Development Act, 2018, national, regional and local terrestrial plans are required to be consistent with the NMPF¹.

Ireland's East Coast has been identified as having the best locations to develop and support the new offshore wind industry within Ireland and WCC is especially well placed to benefit from its development, with the opportunity for increased economic activities within the local supply chain and infrastructure. Ensuring the effective integration of the principles and policies as they relate to Offshore Renewable Energy, which are identified in the draft NMPF, in the County Development Plan will ensure that the leadership as demonstrated in being the first Local Authority to declare a Climate and Biodiversity

¹ Chapter 2.0, Section 2.3 of the National Marine Planning Framework, consultation draft November 2019

Emergency is sustained through the new County Development Plan.

In the coastal area off Wicklow county there are a number of significant offshore windfarm development projects which are at concept/early planning stage, those with consent applications submitted and those which have consents authorised and these are clearly identified in draft NMPF². Whilst it is anticipated that future development consent applications for significant offshore windfarm developments will be progressed under the Marine Planning and Development Management legislation, it is clear that WCC will continue to play an instrumental role in informing any such decisions on development consent. Specific planning policies relevant to Offshore Renewable Energy are set out in ORE Policies 1 to 11³. Particular attention is drawn to ORE Policy 3 which underpins the importance of ensuring that there are no proposals or policies promoted which 'could affect sites held under a permission or that are subject to an ongoing permitting or consenting process for renewable energy generation'. This could arise for example through the inclusion of conflicting land-use zoning, land-use development or land-use/amenity protection policies in the CDP when considered in the context of the ORE policies outlined above.

In addition, ORE Policies 10 and 11 recognise the significant opportunity for economic development and enterprise in coastal local authorities, such as Wicklow, to support the offshore wind industry, such as development of existing harbour infrastructure and associated services.

ORE Policy 10 'Opportunities for land-based coastal infrastructure that is critical to and supports development of ORE should be prioritised in plans and policies, where possible'.

ORE Policy 11 'Where appropriate, proposals that enable the provision of emerging renewable energy technologies and associated supply chains, will be supported'.

Ensuring support for offshore wind development in the County Development Plan and its associated enabling land-based infrastructure needs will pave the way for attracting and securing additional investment in harbours and coastal communities.

Support for IWEA Submission

As a member of the Irish Wind Energy Association (IWEA), innogy also endorse the submission made by IWEA in December 2019 – and in particular their suggestions regarding the need to ensure that wind resource data is not regarded as a constraining factor when developing and zoning future areas for renewables. Recent advances in turbine technology are enabling better utilisation at lower wind speeds than was previously achievable. We note also their suggestion that grid constraints are not considered within the future Renewable Energy Strategy as this is a risk that can and should be managed by project developers.

If you have any questions regarding our submission, please do not hesitate to contact us.

Peter Lefroy

Director, Innogy Renewables Ireland Limited.

² Marine Renewable Energy and Infrastructure, page 125, National Marine Planning Framework, consultation draft November 2019

³ Section 11.0, pages 119 to 120, National Marine Planning Framework, consultation draft November 2019