Energy for generations

Wind Energy Variation,
Central Planning Unit,
Donegal County Council,
County House,
Lifford,
Co. Donegal,
F93 Y622

03rd June 2022

Re: Donegal County Council 2018-2024 – Proposed Wind Energy Variation

Dear Sir/Madam,

This submission by Electricity Supply Board (ESB), 27 Lower Fitzwilliam Street, Dublin 2, is in response to an invitation by Donegal County Council for submissions to the proposed Variation No. 2 to the County Donegal Development Plan 2018-2024, (As Varied) in respect of a Wind Energy Policy Framework.

Proposed Variation No. 2

The Minister of Communications, Climate Action and Environment recently launched the updated Climate Action Plan 2021. The Climate Action Plan follows the Climate Act 2021, which commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030. These targets are a key pillar of the Programme for Government.

Among the most critical measures in the Government's Climate Action Plan is that 80% of electricity will be generated by a mix of at least 5 GW offshore wind, up to 8 GW onshore wind and 1.5 - 2.5 GW from solar PV. Energy storage systems and landside developments for offshore wind and an enhanced electricity Transmission and Distribution Grid are essential to achieving these targets. It represents a significant change for the electricity industry and ESB is committed to doing its part in supporting and delivering on the Government's energy policy.

According to the Climate Action Plan 2021, the share of electricity from renewable energy increased almost five-fold between 2005 and 2008 – from 7.2% to 33.7%. Based on SEAI analysis, February 2020 provided a record-breaking month with 56% of energy demand met by wind energy, the highest monthly total since records began. In the 12 months to end of January 2020, wind and other renewable sources, hydro, solar and biomass accounted for 37% of demand. These are encouraging trends, but further acceleration of deployment is necessary to achieve the Government's target for 2030.

Mirroring Government objectives, by 2030 ESB will develop an additional 4 GW of new onshore and offshore wind and solar PV renewable assets to add to our 1 GW of renewable operating today. By 2030, 63% of our electricity will come from renewable sources. We will be a net zero producer of electricity by 2040. ESB remains committed to completely transforming our generation portfolio, replacing old, inefficient plant with a mixture of renewables and high-efficiency gas capacity.

It is acknowledged that Donegal is already contributing to renewable wind energy generation, with installed renewable energy projects throughout the county. However, in reviewing the proposed Variation, ESB consider that the textual and mapping changes as proposed will significantly limit the ability of Donegal County Council to positively contribute further towards our national climate action plans and are contrary to established Government guidelines and sustainable development policies. ESB wish to make some observations in relation to Proposed Variation as set out below.

Section 28 Statement & Wind Energy Context

The proposed textual changes to the Section 28 Statement aims to algin the Plan's wind energy policy with the Draft Wind Energy Guidelines and particularly the Specific Planning Policy Requirements (SPPRs). However, as acknowledged in the proposed text to be included in Part A, Section 2, Appendix 2, *Wind Energy Development Guidelines;* the approach taken by the Council in preparing the Variation, has resulted in an inability to fully satisfy the requirements of SPPR 1 and furthermore is completely at variance with SPPR 2.

The proposed text for inclusion in Chapter 8, *Natural Resource Development,* Section 8.2.1 acknowledges the importance of wind energy as a renewable energy resource which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and therefore greenhouse gas emissions. This Section claims that the Council's approach to wind energy has been prepared having regard to National and Regional Policy and this extends to the preparation of Map 8.2.1 entitled '*Wind Energy',* subject to the amendments made by resolution of the Council as set out in the Section 28 Statement. In this regard, ESB assert that the approach taken by Donegal County Council will have the effect of seriously diminishing the land area potentially available for wind energy projects and has the potential to severely restrict the renewal/repowering of existing wind farms with consequent implications for the non-attainment of already very challenging binding national obligations in relation reducing emissions.

Proposed Wind Energy Map & Setback Distance

The Government's Draft Revised Wind Energy Development Guidelines (2019) provides a step-by-step guide for the analysis of suitable areas for wind energy by the planning authority. This ordered approach involves a sieve mapping analysis of the key environmental, landscape and technical criteria to identify the most suitable areas for wind energy development. The Proposed Variation states that Map 8.2.1 was prepared using, as a basis, the methodology set out in Section 3.6 of the Governments Draft Guidelines, however the Elected Members, by resolution, made five amendments, changing areas from *'Open to Consideration'* to *'Not Normally Permissible'.*

ESB consider that the resolutions by the Elected Members as reflected in proposed Policy E-P-23, combined with additional requirements contained in proposed Policy E-P-12 (Part 2), are excessive and extend beyond the requirements of the Wind Energy Guidelines. ESB wish to highlight that Government policy recognises that public acceptability is required for the delivery of key energy projects and that to achieve public confidence project proposals must adhere to the highest international standards of safety, health and environmental and visual impact, and technology choice. This requires each energy project to be evaluated on a case-by-case basis and over restrictive policies should not prevent consideration of all options with a view to identifying the optimum solution. This is reinforced on pg. 7 of the Draft Wind Energy Guidelines, under the heading *Natural Heritage and Biodiversity* where it states:

> *"The Habitats Directive does not, a priori, exclude wind energy developments in or adjacent to Natura 2000 sites. These need to be judged on a case by case basis."*

In should be noted that Environmental assessment or environmental impact assessment are procedures that ensures that the environmental effects of certain plans, programmes or projects are assessed before the decisions are made. Consultation with the public is a key feature of environmental impact assessment and environmental assessment procedures. ESB suggest that the areas impacted by the resolutions should remain in the '*Open to Consideration'* category with wind energy developers providing the appropriate mitigation to key risks, such as peat slide, and adopt a plan to enhance the receiving environment in consultation with the local community. In this regard, ESB request that Map 8.2.1 '*Wind Energy'* be re-examined and prepared in compliance with Table 1 of the Draft Wind Energy Guidelines.

ESB has carried out further analysis of Map 8.2.1 '*Wind Energy'* to consider the implications of applying setback distances. When a 1800m setback buffer from residential development is applied i.e. 10 times the tip height of a 180m turbine, the analysis concludes that it would not be possible to progress a wind energy project at any location in the County. Furthermore, due to the onerous constraints applied to the Wind Energy Map, when the setback distance is reduced to 4 times the tip height, as per the Guidelines, there is practically no improvement, rendering it impossible to progress wind energy developments in the county.

As set out in the Proposed Variation, Donegal County Council accepts that proposed policies E-P-23 and E-P-24, that seek a setback distance of a minimum of 10 times the tip height are at variance with SPPR 2 in the Guidelines.

It should be noted that the Government Guidelines on Wind Energy Development (2006) did not set out limits on the height of turbines but rather highlighted that the scale of the surrounding landscape should dictate height. However, in June 2017 a *"preferred draft approach"* was jointly announced between the Dept. of Housing, Planning, Community & Local Government (DHPCLG) and the Department of Communications, Climate Action and Environment (DCCAE). The more recently published Draft Revised Wind Energy Development Guidelines (2019) has again confirmed the *"preferred draft approach".*

The *"preferred draft approach"* for visual amenity comprises a setback distance **of 4 times the tip height between a wind turbine and the nearest point of the curtilage of any residential property, subject to a mandatory minimum setback of 500 metres**. Setback requirements would also be subject to compliance with noise limits to ensure that wind energy projects operate in accordance with the highest international and World Health Organisation advice in order to protect the amenity of the communicates in which they are situated.

It is clearly stated in the Draft Revised Wind Energy Guidelines that:

> *"It is a specific planning policy requirement of these Guidelines under Section 28(1C) of the Planning and Development Act 2000, as amended, that, in both their development planning and management functions, planning authorities shall not apply a setback distance that **exceeds** these requirements."*

Repowering Existing Wind Farms

ESB supports the provision of supporting objectives for repowering of existing wind farms. Repowering can grant a new lease of life to existing renewable energy projects by extending the planning lifetime of existing windfarm with no, or minimal, new development. Well-maintained renewable energy projects and associated plant can operate safely after a planning expiry date of 20-30 years. Existing developments have the benefit of acceptance by local communities and contribute economically to the County through the payment of rates and community benefit funds. However, we also wish to highlight concerns in relation to the repowering and extension of existing sites. Wind turbine technology, as well as technology for integrating wind energy into electricity systems designed for conventional power, will continue to advance in the coming decades. The SEAI highlight that as wind markets mature, repowering and operation and maintenance will become key to the retention of a sustainable industry and will contribute significantly to renewable generation output. In this context, ESB wish to highlight that repowering of existing sites may involve a complex redesign which may include the requirement for the redesign of turbine configuration, site access, internal roads, etc. Notwithstanding the wording of Part (c)(ii) of proposed Policy E-P-12 which states:

> *"The augmentation, upgrade and improvements of: existing windfarms; windfarm developments under construction; developments where permission has lapsed but substantial works have been completed, or on sites with an extant planning permission will be open to consideration where such proposals shall be generally confined to the planning unit of the existing development."*

ESB wish to highlight that proposed Policy E-P-23 is in direct conflict with the above policy, as it states:

> *"In all cases, whether in 'Acceptable in Principle', 'Open to Consideration' or 'Not Normally Permissible' areas, compliance with the setback distances required under Policy E-P-23 will be required. For re-powering or augmentation projects, the required setback distance shall be the required multiple of the new turbine height and no allowance shall be made in this regard for the established development."*

As outlined above, the proposed setback distance of 10 times the tip height of proposed or repowered turbines from the nearest part of the curtilage of residential properties is contrary to national policy and Ministerial guidance on wind farm development, inconsistent with national Climate Action Plan objectives and undermines other supportive wind energy policies in the plan. Development policies for wind energy

projects should be consistent with Government Guidelines and the *"preferred approach"* as outlined by the Department.

Conclusion

ESB, is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. ESB is implementing energy strategies that support the transition of Ireland to a low-carbon and ultimately post-carbon economy to become a competitive, resilient, and sustainable region. Offshore renewable energy forms part of ESB's strategy and in Ireland will act as a driver to significantly reduce greenhouse gas emissions and accelerate the move to cleaner energy in line with national and EU policy, however it will be closer to 2030 before the offshore potential comes on stream. In the interim all counties, including Donegal must continue to contribute to the achievement of the 80% renewables target by promoting onshore wind development.

In this regard, we request that due consideration is given to the issues raised in this submission, most particularly:

- ESB is concerned that policies contained in the Proposed Variation are too restrictive and may prevent the development of the optimum design for renewable energy projects where all the technical, environmental and economic factors are fully considered. The statutory planning framework provides the necessary structures for ensuring that all necessary standards are met, and extensive statutory and non-statutory consultation is an intrinsic part of this planning process.

- That the methodology employed in preparing the Wind Energy Map is re-examined. The map in its current form is contrary to national policy and Ministerial guidance on wind farm development, inconsistent with national Climate Action Plan objectives and undermines other supportive wind energy policies in the plan.

- Having regard to the government's commitment in the *Climate Action Plan 2021* to achieve 80% of electricity from renewable sources by 2030, National policy Objective 55 which promotes renewable energy use and generation to meet national targets and the SPPR's in the *Wind Energy Guidelines* ESB request that the policy seeking 10 times the tip height separation distance is omitted from the Proposed Variation.

If we can be of any further assistance, or if you wish to clarify any of the points raised, please do not hesitate in contacting the undersigned.

Yours sincerely,

Colm Cummins | Senior Planner | Engineering & Major Projects | ESB
T: +353 1 702 6357 / +353 87 763 8171 | www.esb.ie