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WEDG Review Submissions,
Planning Policy and Legislation Section,
Department of Housing, Planning and Local Government,
Custom House,
Dublin 1,
D01 W6X0.

19th February 2020

RE: Public Consultation on the revised Wind Energy Development Guidelines

SRA File Ref: 20/GD001

A Chara,

The Southern Regional Assembly welcomes the preparation of the revised Wind Energy Development Guidelines. Climate change is the universal challenge that affects our future environment, economy and how our communities live. Maintaining Ireland's ability to deliver on its binding energy policy obligations by delivering sustainable energy projects is a necessary response to the challenge of climate disruption.

The Southern Regional Assembly has prepared a Regional Spatial and Economic Strategy (RSES) for the Southern Region. The RSES provides a long-term, strategic development framework for the future physical, economic and social development of the Southern Region and includes Metropolitan Area Strategic Plans (MASPs) to guide the future development of the Region's three main cities and metropolitan areas – Cork, Limerick-Shannon and Waterford. It provides the framework through which the National Planning Framework (NPF) vision and the related Government policies and objectives will be delivered for the Region.

The Southern Region faces an era of great change, challenge and opportunity. Over the next 20 years, our population will grow by nearly 400,000, our age profile and our family structures will be transformed. We face rapid global change, technological developments and the dramatic impact of climate change. We need a new approach to manage our future in a planned productive and sustainable way.

The RSES sets out a vision for the Southern Region to:

- Nurture all our places to realise their full potential
- Protect, and enhance our environment



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- Successfully combat climate change
- Achieve economic prosperity and improved quality of life for all our citizens
- Accommodate expanded growth and development in suitable locations
- Make the Southern Region one of Europe's most creative, innovative, greenest and liveable regions

While informed by national, EU and international policies, the RSES is driven at the local level by Elected Members, local authorities, stakeholders, community groups and individual citizens who have shaped the shared strategy.

Section 3.2 of the *Draft Revised Wind Energy Development Guidelines* refers to the Regional Planning Guidelines. Please note that these have now been replaced by the Regional Economic and Spatial Strategies for each of the three regions. Please also note that references to "regional authorities" should be removed and replaced with "Regional Assemblies".

RSES and Climate Change

The RSES prioritises action on climate change across all strategic areas and in all economic sectors. Chapter 5 (*Environment*) of the RSES supports the implementation of the Government's Climate Action Plan 2019 and has identified three priority areas – Decarbonisation, Resource Efficiency, Climate Resilience - for action to address climate change:

The RSES states that achieving national and EU targets will require investment in measures to develop alternative renewable energies with greater interconnection to energy resources. The RSES recognises that there is significant potential for action to ensure we meet the targets set for the State through development of wind, wave and tidal energy, solar, hydro, bioenergy, combined heat and power systems targets. Support for further initiatives in these areas will be advanced by the *Regional Renewable Energy Plan* (as per Regional Policy Objective (RPO) 90 of the RSES), the *Regional Renewable Energy Strategy* (as per RPO 98 of the RSES), and the ongoing work of the Department of Communications, Climate Action and Environment to address the access to the grid system.

Chapter 8 (*Water & Energy Utilities*) of the RSES recognised that there is significant potential to use renewable energy across the Region to achieve climate change emission reduction targets. With costs actively driven down by innovation in solar, onshore and offshore wind in particular, the renewable industry is increasingly cost competitive. The RSES supports renewable industries and requirements for transmission and distribution infrastructure. This is captured in RPO 95 where it is an objective to:

"support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined



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in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.”

RSES and Wind Energy

The RSES recognises and supports the many opportunities for onshore wind as a major source of renewable energy. Opportunities for both commercial and community wind energy projects should be harnessed. Wind Energy, with current and future developing technology, has an important role in delivering value and clean electricity for Ireland. Regional Policy Objective (RPO) 99 Renewable Wind Energy states:

“It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.”

The urgency of delivering initiatives which accelerates a move towards green energy is identified in RPO 102 which states:

“It is an objective to support initiatives for energy research funding within our region to accelerate diversification away from fossil fuels to green energy, including the potential of wind, wave, solar, biomass, biofuels, biogas and hydrogen in the Region.”

RPO 114 references wind farm development within the context of Flood Risk Management:

“It is an objective to:

- a. Ensure that the flood risk management objectives of the Flood Risk Management Plans are fully considered in the development of planning policy and decision-making by local authorities so that flood risk is a key driver in the identification of suitable locations for new development, considering the CFRAM flood maps and other flood maps as available.*
- b. Ensure that developments in upland areas, such as **wind farm developments**, roadway construction, peatland drainage and forestry proposals, provide sufficient storm water attenuation to avoid the occurrence of river erosion or flooding downstream subject to hydrological and ground/peat stability assessments.”*

The good practice example in relation to the Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary (page 127 of the RSES) states that there are significant opportunities to grow the Blue Economy through offshore wave and wind renewable energy in the Shannon Estuary,



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reflecting the key natural assets of wave and wind energy, together with the presence of grid-connections.

Section 4.9.2 *Growing the Blue Economy* states that NPF supports the progressive development of Ireland's offshore renewable energy potential, including domestic and international grid connectivity through the *Offshore Renewable Energy Development Plan (OREDP)*. Wind energy is currently the largest contributor of renewable energy and it has the potential to achieve between 11-16GW of onshore wind and 30GW of offshore wind by 2050 (SEAI, 2016). The sector can make a significant contribution to meeting national energy demands while attaining our energy and emissions targets for 2020 and beyond.

Landscape and Natural Amenities

The Southern Region includes Ireland's highest mountain ranges, extensive coastal areas and islands, urban landscapes, river valleys, estuaries and the unique limestone area of the Burren. Landscape character areas and protected sites, such as NHAs, SACs and SPAs, frequently overlap administrative boundaries and it is important that there is a consistent approach to their management and protection.

In this regard, RPO 129 states that it is an objective to develop a Regional Landscape Strategy to facilitate landscape protection, management and change. The implementation mechanisms and monitoring structures to be established following the adoption of the RSES will identify the scope and role of the Regional Landscape Strategy for the Region and the timescale for its preparation.

Section 7.3.1 of the RSES supports the NPF objectives underlining the importance of biodiversity and the protection of our natural heritage and landscape and these policy objectives are reflected in Regional Policy Objectives such as RPO 126: Biodiversity.

Conclusion

The RSES reinforces the NPF's aim to achieve transition to a competitive low carbon, climate-resilient and environmentally sustainable economy by 2031 through a strong and innovative commitment to change. This transition will require a wide range of policy responses across industry and public sectors in combination with a community response to change the way we use energy at home, in our work and how we travel.

The Southern Regional Assembly welcomes the opportunity to make this submission and is available to provide any clarification relating to the issues raised in this submission.

**Tionól Réigiúnach an
Deiscirt**

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Mise le meas,



David Kelly,
Director