



Forward Planning, Economic Development and
Enterprise Directorate
Limerick City and County Council,
Merchants Quay,
Limerick.
Email: office@WindEnergyIreland.com

By Email to devplan@limerick.ie

11th April 2022

Dear Sir/Madam,

Re: Material Alterations to the Draft Limerick Development Plan 2022-2028

Introduction

Wind Energy Ireland (WEI) (formerly Irish Wind energy Association) welcomes the opportunity to make this submission on the Material Alterations to The Draft Limerick Development Plan 2022-2028 (draft Plan). WEI have a number of concerns with the above Draft Plan including the Proposed Material Amendments (Proposed Plan) in relation to wind energy. WEI is the representative body for the Irish wind industry, working to promote wind energy as an essential, economical, and environmentally friendly part of the country's low-carbon energy future. We are Ireland's largest renewable energy organisation with more than 150 members who have come together to plan, build, operate and support the development of the country's chief renewable energy resource.

The criticality of onshore wind in Ireland's energy mix is apparent when the near-term trajectories in the Clean Energy Package Governance Regulation (2018) are considered. This requires all member states to submit National Energy and Climate Plans (NECP) setting out how each member state will contribute to the decarbonisation objectives of the European Union.

Following on from the 2019 Climate Action Plan, the Government published the National Development Plan 2021 – 2030 (NDP) on the 4th of October 2021 which increases Ireland's renewable electricity target to 80% by 2030 from the previous target of 70%. To achieve this **new 80% target**, the NDP earmarks a target of 5GW offshore wind and **a doubling of existing onshore wind from circa 4GW (today) to 8GW by 2030, signalling onshore wind as crucial in the roadmap to decarbonization. This increase to 80% should serve as a key policy indicator for onshore wind development going forward.**

To put the scale of the ambition into further context it should be noted that it has taken 20+ years to achieve the current level of renewable penetration onto the Grid. The challenge is now to achieve twice as much in half the time. This is of particular significance in the context of the lifetime of the draft Plan to 2028. While we are supportive of most of the County Councils positions regarding climate action and

renewables our main concern outlined in this submission relate to proposed material amendments No. 73.

1 Material Amendment No. 73

The proposed amendment by Limerick County Council has put forward a 65% increase in the current capacity of onshore wind. While this increase is welcomed it is unclear how they came to this figure and how it relates to the overall national targets.

The proposed material No. 73 details a new Renewable Energy Target Table in X in Section 8.4 Renewable Energy. This identifies an operational capacity of 234.35 MW and a Target capacity of 386.45 MW by 2030 which is an increase of 65%.

Part B 'Submission Summaries, Chief Executive's Responses and Recommendations' of Volume 1 of 'Draft Limerick Development Plan 2022-2028: Chief Executive's Report on Public Consultation' (CER) notes the Office of the Planning Regulator (OPR) recommendations on the draft Plan. The OPR's recommendation 16 'Renewable Energy Targets and Wind Energy' notes that the council is required to indicate how the development plan will contribute to meeting national renewable energy targets, including specific targets in megawatts for wind energy potential in the County. Part (i) notes:

"Indicate how the development plan will contribute to meeting national renewable energy targets, including specific targets in megawatts for wind energy potential in the county. In the absence of any nationally or regionally determined targets for County Limerick specifically, you are advised to demonstrate appropriate metrics in this regard, which could include Limerick's share of estimates of additional national renewable electricity target as defined by the % of national land area represented by the county, linked back to the cumulative renewable energy production potential of the areas designated for renewables development."

WEI believes that it is unclear how Limerick County Council has quantified and demonstrated how they will reach their 65% target in this draft Plan. WEI also has concerns in how they have placed repowering at the center of achieving its renewable energy targets. The CER quotes a IWEA report (2019) on repowering noting the potential benefits of repowering older wind farms. It quotes a section of the report that suggests repowering could be an enabler for Ireland's 2030 targets. In this section the IWEA analysis of the national installed capacity and future potential of repowering of old wind farms is noted as having the potential of increasing the total installed capacity by 65%.

The council should not take an analysis based on a national scale as a guide for a county target. Wind Turbines are typically designed to operate for 20-25 years. As turbines near end-of-life, repowering provides an alternative to decommissioning however, life extension is also another potential solution. A full analysis of the age of the current installed wind farms would be required to make any future installed capacity projections. The CER explains its 2030 renewable electricity targets as follows:

"They also quote a possible increase in capacity of 65% (IWEA 2019, p.11). This comes very close to LCCC | Draft Limerick Development Plan 2022-2028 – Chief Executive's Report 46 (ii) Delete the requirement set out in Section 11.7.2.1 which states that "turbines shall be no closer than 100m from the boundaries of adjacent properties without the written consent of the landowner in areas preferred for wind farm development" as the inclusion of a requirement for would restrict the potential for wind farm development in the county (areas open for consideration),

would undermine other policy objectives supporting wind farm development and be contrary to national policy and Ministerial guidance on wind farm development. the figure of 70% of electricity from renewable sources that the Government has set as a 2030 target. As a result, the Council has decided to use the 65% target and the draft plan shall be amended to include a table, which will summarise the allocations for each of the renewable energy technologies.”¹ (CER, 2021)

WEI do not believe this is an adequate analysis of how the draft Plan will contribute to meeting national renewable energy targets. Also as noted in the introduction the Government has set a new target of 80% renewable electricity by 2030. The CER’s reasoning for material amendment No. 73 was based on the old 70% target not the new target.

It is also worth noting that this proposed increase in installed wind energy capacity is in conjunction with the reduction of ‘Areas open for consideration’ to the east of Foynes north of Askeaton and west of Pallaskenry. in the draft plan. The proposed wind energy map results in an overall decrease in area for potential wind energy developments. This is particularly problematic considering the desired 65% increase of installed capacity.

Conclusion

The need to increase our renewable generation is clear. Onshore wind farm development is a proven technology that can deliver at pace and scale and is critical to achieving national targets and particularly targets over the six-year lifetime of the draft Plan. It is vital that we increase Ireland’s renewable energy capacity and decarbonize the energy sector. The urgency to secure Ireland’s energy generation has been starkly amplified with the ongoing energy supply risks throughout Europe because of the continued conflict in Ukraine.

WEI therefore request that the Council review its approach to designating its renewable energy targets within the draft Plan so that it aligns with national policy objectives. The council needs to ensure that enough land has been designated as “Preferred Areas” or “Areas Open for Consideration” for wind farm development in the draft Plan. If the Council fails to designate enough land it will find it difficult to reach the targets set out in material amendment No. 73.

Yours sincerely,

Denis Devane
Senior Policy Analyst



E: denis@windenergyireland.com

W: www.windenergyireland.com

Sycamore House, Millennium Park, Osberstown, Naas,
Co. Kildare

¹ DRAFT LIMERICK DEVELOPMENT PLAN 2022-2028 Chief Executive’s Report on Public Consultation Volume 1 (2021)