



Renewable Energy Systems Limited
Willowbank Business Park, Willowbank Road, Millbrook, Larne
County Antrim, Northern Ireland BT40 2SF, United Kingdom
T +44 (0)28 2844 0580 F +44 (0)1923 299 299
E info@res-group.com www.res-group.com

Administrative Officer,
CDP Review,
Forward Planning Policy Unit,
Áras an Chontae,
Prospect Hill,
Galway.

Via email - forwardplanning@galwaycoco.ie

Dear Sir/Madam,

RES is the world's largest independent renewable energy company with operations across Europe, the Americas and Asia-Pacific. At the forefront of renewable energy development for 35 years, RES is responsible for more than 13GW of renewable energy capacity and energy storage projects worldwide.

RES is active in a range of renewable energy technologies including onshore wind, offshore, solar and energy storage. From our office in Larne Co Antrim, RES has been at the forefront of wind farm development in Ireland since the early 1990s. We have developed wind energy projects across Ireland including Taurbeg Wind Farm in Co Cork, Milane Hill Wind Farm in Co Cork, Beenageeha Wind Farm in Co Kerry and Cark Wind Farm in Co Donegal.

RES has a growing portfolio of solar and energy storage projects across Ireland. As a multinational company RES has extensive experience of developing projects in other markets and understanding how to bring the most cost-effective generation projects forward to power homes and businesses in line with our vision to be a leader in the transition to a future where everyone has access to affordable low carbon energy.

RES wants to be a part of Ireland's energy future, ensuring that our projects contribute to decarbonising our electricity system to the least cost to the consumer. We therefore welcome this opportunity to respond to Galway County Council on the Issues Paper in the preparation of the Galway County Development Plan 2022-2028.

As a member of the Irish Wind Energy Association (IWEA) we also fully endorse the response which they have made however RES wishes to provide some additional comments outlined below.

This submission has been prepared in accordance with section 11(2) of the Planning and Development Act 2000 (as amended) and focuses on strategic issues concerning the Council's energy policy in particular renewable energy.

This submission outlines the need for Galway County Council to adopt a pro-active and plan-led approach to Renewable energy development (including all forms of Renewable Energy – Onshore Wind, Solar and Battery Storage) in the County in order to meet national energy development targets and includes suggested solutions in the preparation of a new Renewable Energy Strategy for the County. In addition, RES identifies the economic benefits of wind energy to the County and why

Renewable Energy should be identified in the Draft Plan as a significant potential contributor to the local economy in Galway.

By initiating the preparation of a new County Development Plan (CDP) for Galway, Galway County Council should take the opportunity to review its renewable energy policies at the start of a new decade, in light of quite different Government climate change, environmental and energy policies. Changes to various Government renewable energy policies in recent years has now put planning permission as the critical first stage of any renewable energy projects. Only when planning permission is secured can a project now apply for a grid connection to export the energy to the national electricity grid and identify a route to market to sell the energy that will be generated. Therefore, clear and supportive planning policies for renewable energy developments (including Wind and Solar) will be required to ensure we meet the challenges of addressing climate change and decarbonising the Irish economy over the next decade.

RES believes that Galway needs a progressive and ambitious Renewable Energy Strategy as part of its new CDP with clear and supportive policies in favour of further wind energy development. This will be critical for national efforts to reach 70% renewables by 2030.

National & Regional Policy

The National Climate Action Plan (CAP) 2019 has set an ambitious 70% target for renewable energy production by 2030. To meet this target, the amount of electricity generated from renewables will have to be doubled on current figures. Based on the CAP assumptions, onshore wind will provide the majority of the required electricity yield out to 2030, with Solar also playing an important role. Taking account of this, Galway County Council and all Local Authorities should be cautious when considering the designation of areas for renewable energy development going forward, so as not to constrain any areas which may have renewable energy potential, particularly for wind generation.

The Department of Housing, Planning, Community and Local Government (DHPCLG) Section 28 Guidelines 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change' (July 2017) clearly set out that it is a specific planning policy requirement under Section 28 (1C) of the Act that, in making a development plan with policies or objectives that relate to wind energy development, the relevant planning authority shall carry out the following three actions:

1. Ensure that overall national policy on renewable energy is acknowledged and documented in the development plan
2. Indicate how the implementation of the development plan will contribute to realising overall national targets on renewable energy and climate change mitigation and in particular wind energy resources (in MW) and,
3. Demonstrate detailed compliance with item no. 2 above with regard to development management objectives and have such development management objectives subject to SEA and AA with regard to likely significant effects on climatic factors in addition to other environmental factors.

RES looks forward to seeing the SEA use an evidence-based approach to confirm that the policies and objectives of the draft County Development Plan are sufficient to comply with Galway County Council's obligations in this regard.

Facilitating Renewable Energy

RES strongly promotes the delivery of a Regional Renewable Energy Strategy such an approach would ensure consistency across the entire region and minimise duplication of effort and resources at a local authority level.

We believe an updated Renewable Energy Strategy for County Galway is an absolute requirement as part of the making of the new Galway County Development Plan 2022. The Strategy should ensure a proportionate contribution to national renewable energy targets is achievable within the County.

Renewable Energy Development can generate significant investment opportunities for County Galway throughout its lifetime and to contribute to communities through community benefit funds and to the local authority through rates. Therefore, wind and solar energy are of strategic importance to the County both in addressing Climate Change and in growing the economy of County Galway.

Renewable energy generates economic benefits of two types, the initial capital investment, and the ongoing investment during the operational life of the wind farm. On the initial capital investment, every megawatt (MW) of wind energy capacity installed gives rise of an investment of approximately €1.25 million. If the next Galway CDP were to lay the right policy foundations for a further 300MW of wind energy development in the County over the next decade, that development would represent an investment of €375 million.

The potential economic benefits need not be capped at 30 years. As wind turbine technology has improved operational lifespans have extended further. Most developments that obtain planning permission in Ireland are afforded a planning permission of infinite duration. However, despite their being no legislative basis for this, it has been commonplace in Ireland for the life of a wind farm to be restricted by a condition of the planning permission.

RES along with IWEA have recommended that such conditions are removed on all future wind farm planning permissions, while accepting that this will not apply to wind farms already proposed, permitted or operational where an operating lifespan of finite duration was already specified in the planning application or planning permission.

The industry is seeing that existing projects now expect to be operating for 30 years and beyond and foresee new machines matching this if not extending further. Lifetime extensions will of course help to maximize the environmental benefits obtained from sustainable wind generation. RES would comment that the expansion and upgrading of existing sites is likely to offer the least environmental impact for most viable sites. The re-powering/redevelopment of renewable energy projects provide a long-term asset and embrace the Circular Economy approach of “Reuse – Remanufacture – Recycle”. RES would draw the Council’s attention to the approach taken in the UK. Scottish Planning Policy “Many established onshore wind sites will be coming to the end of their consented life during the coming decade and beyond. As the need and demand for renewable power increases, we expect developers to review the potential for “repowering” at existing sites.

RES would encourage the Council to consider a positive policy that supports redevelopment and allows amendments to wind farms to support advances in technology or the co-location of other forms of low carbon generation or technologies (i.e solar and energy storage) which may increase the efficiency of any existing renewable technology should also be embraced and built in to policy and guidance. This will enable more efficient, lower cost, stable energy generation in the future through the later inclusion of increased efficiency technologies.

RES believes that the new Renewable Energy Strategy for County Galway should not seek to replace or alter the requirements of the Wind Energy Development Guidelines, currently the subject of a targeted review by the Department of Housing, Planning and Local Government. The 2006 version of these guidelines provided guidance in relation to noise, shadow flicker, setback distance and other project-level design criteria. These, and other design criteria are likely to be updated as a result of the ongoing review of these Guidelines.

The new County Development Plan and Renewable Energy Strategy for County Galway should refer to these Guidelines and require future proposed wind energy developments in County Galway to comply with the guidelines of the day. The Department has clearly stated on numerous occasions the 2006 guidelines remain in effect until they are replaced. The new County Development Plan and Renewable Energy Strategy for County Galway need not and should not seek to alter or vary whatever guidance emerges from the Department by way of the targeted review, but should just refer to the Departmental guidelines as setting the project-level design standards that will be expected of any wind farm developments proposed for County Galway.

Conclusion

The draft County Development Plan should bring forward progressive policies and objectives that ensure that Galway can deliver its share of the national climate change and renewable energy targets intended to decarbonise the Irish economy in line with the National Planning Framework and Climate Action Plan. Galway County Council must be confident its policies and objectives as outlined in the next County Development Plan, will be able to deliver on those national targets, as it is only through the individual policies, objectives and actions of the 31 Local Authorities across the country that the national targets can be achieved.

RES would urge Galway County Council to review and update their Wind Energy Strategy in the context of the Climate Action Plan targets and review its designations for wind energy development in light of best practice approaches in the knowledge that wind speeds and proximity of grid nodes are not constraints to development that should be considered in land-use zoning or designations. Similarly, we request the Development Plan and Renewable Energy Strategy to recognise that Wind Energy Development can co-exist with Tourism development and both uses are compatible.

Furthermore, the wind energy should be recognised as having potential to be a significant contributor to the local economy in Galway, facilitating inward investment into the County.

We hope that you consider the items above and we would welcome the opportunity to meet with you to further discuss the points which have been raised in this letter.

Yours sincerely,



Lucy Whitford
Managing Director UK&I Construction & Development
E -lucy.whitford@res-group.com

¹Scottish Government- Onshore Wind Policy Statement, December 2017
www.gov.scot/Resource/0052/00529536.pdf