

From: [REDACTED]
To: [forwardplanning](#)
Subject: CDP Review
Date: Thursday 10 September 2020 09:30:12
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[2020.09.10 MKO Pre-Draft CDP Review Submission.pdf](#)

Dear Sir/Madam,

Please find attached a submission to the pre-draft stage of the CDP Review on behalf of MKO.

Best regards,

Brian Keville



Brian Keville [B.Sc.](#) (Env.)
Environmental Director

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Administrative Officer,
CDP Review,
Forward Planning Policy Unit,
Galway County Council,
Árus an Chontae,
Prospect Hill,
Galway

Our Ref: GCDP-BK
Your Ref:

10th September 2020

Re: Galway County Development Plan 2022-2028 – Pre-draft Submission

Dear Sir/Madam,

MKO is a Galway-based planning and environmental consultancy, employing 80+ professionals. Our company works across all sectors of the economy, but we have developed a particular specialism in wind energy over the last decade, working for the majority of the larger developers active in Ireland today. Our firm has had a role in all but two of the wind farms built or permitted in County Galway in the last decade. This pre-draft submission on the 2022-2028 Galway County Development Plan relates solely to wind energy, given our detailed knowledge of that industry sector, and we very much welcome the opportunity to make this submission.

The scale of challenge ahead in transitioning our country's economy from one largely based on fossil fuels to one that is low carbon and eventually carbon neutral, is enormous. By the end of 2020, as a state we should be generating almost 40% of our electricity from renewable energy, with the vast majority of that coming from wind energy. The all of Government Climate Action Plan published in 2019 has clearly signalled a much greater ambition in furthering this energy transition, with 70% of our electricity having to come from renewables by 2030. It will have taken the installation of 4,200MW of wind energy over 28 years to reach 40% by 2020, and as a state, we will now have to add a further 4,000MW of wind energy in just the next ten years to reach 70% by 2030. The scale of the challenge is enormous, but the opportunity it represents for a county like Galway is equally significant.

County Galway currently has just under 300MW of wind energy currently installed and operating, with a further approx. 140MW permitted. County Galway could easily expect to be able to double this total combined figure, and have close to 900MW of wind energy installed across the county over by the end of this decade. Adding a further 460MW of wind energy over the next decade would result in a capital investment of approximately €690 million in county Galway, would result in over €35 million of contribution to local community funds as mandated by the Government's new Renewable Energy Support Scheme (RESS), and would give rise to €200 million in commercial rates income for Galway County Council over the lifetime of those projects.

The County Galway Wind Energy Strategy has served the county well, by helping to lay a solid planning policy framework for those projects already permitted or operational. It now needs to be



reviewed and renewed, with a new ambition to further harness the abundant wind energy resource that County Galway has.

The current CDP's and Wind Energy Strategy's single large Strategic Area and adjacent Acceptable In Principle areas in west Galway have accommodated practically all of the wind energy developments undertaken in the county in the last decade. The area south of the N59, north of the R336 and between the road linking Moycullen and An Spidéal in the east and Shannafeasteen road in the west, which has accommodated the four separate Galway Wind Park wind farms in addition to the existing Knockalough, Shannagurraun and permitted Ardderroo and Knockranny wind farms, is unique. It is unique in its very low population density, large areas of conifer plantation and consequential low-value habitat, and relatively secluded landscape. There is no other area like this in County Galway with the same wind energy capacity in a single area. Wind farm sites that will be identified and projects that will be brought forward as planning applications in years to come will be much more widely distributed throughout the county. To deliver the necessary number of megawatts needed to drive our transition to a low-carbon economy, we will have to harness the wind energy resource wherever it is available and can be accommodated in accordance with the provisions of the updated Wind Energy Development Guidelines currently the subject of a targeted review by the Department of Housing, Planning and Local Government.

Wind farm projects brought forward in years to come in County Galway will likely be smaller than the 10+ turbine wind farms that have delivered the bulk of Galway's current installed wind energy capacity. Development with smaller clusters of wind turbines will likely become more common in an effort to harness the wind energy potential of smaller sites that are potentially viable and not constrained by planning or environmental constraints.

Wind turbines will inevitably continue to increase in size, as they have always done since the start of the wind energy industry in Denmark in the 1970's. Larger turbines are more efficient, more powerful, and less of them in number are required to generate an equivalent amount of energy. With turbines of 178.5 metres already permitted in County Galway in the Ardderroo project, we will likely see planning applications for turbines of 200+ metres being brought forward in the lifetime of the next county development plan. The new wind energy planning guidelines will likely require turbines to be located at a minimum of four times their proposed tip heights away from any dwellings or adjacent properties, so each project and project applicant will have to consider how best to maximise the wind energy potential of each site while adhering to the x4 tip height setback requirements.

The landscape in certain parts of County Galway is world renowned, and even as heavily involved in the wind energy sector as our company is, we would be amongst the first to say there are certain parts of County Galway where wind energy developments should not be encouraged. The Connemara landscape, combined with the concentration of Natura 2000 sites in this area, in our professional and personal opinions, makes the areas such as those classified as Class 5 - Unique or Class 4 - Special in terms of landscape sensitivity in the current plan, essentially no-go areas for wind farm development. However, that leaves a very large proportion of the county classified in terms of their landscape sensitivity as Class 1 - Low, Class 2- Moderate or Class 3 - High. The most sensitive areas should be

[REDACTED] However, the rest of the county [REDACTED] of a [REDACTED] developments within its landscape, [REDACTED] project [REDACTED] the revised Wind Energy Planning Guidelines, currently under review.



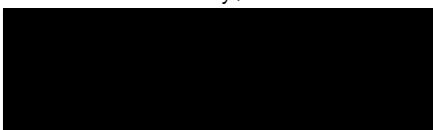
We understand that the commercial rates income from wind energy development in Co. Galway in 2020 will amount to approximately €2.17 million, out of a total rates income of approximately €29.62 million, representing 7.33% of all rates income for the Council. Galway County Council can be quite confident that with the right policies to facilitate further wind energy development in appropriate locations, the current commercial rates income could easily double or triple over the coming years. It is difficult to think of another single industrial sector, where the right planning policies will so quickly and almost certainly translate to such significant commercial rates income for Galway County Council. Within the next decade, it is realistic that wind energy will account for 20% of the Local Authority's commercial rates income, and become vital to the County Council's ability to fulfil its function. Wind energy could become a significant enabler for Galway County Council through this significant rates income, allowing the Local Authority to undertake initiatives and projects that would not otherwise be possible.

Under the Government's new Renewable Energy Support Scheme (RESS) which provides wind farm projects with a guaranteed route to market for the electricity they generate, there is a mandatory community fund payment of €2 per megawatt hour of electricity generated. We believe this will be a "game changer" for local communities that host wind energy developments, and will allow project developments to present a project of the future in a very different light to how projects of the past will have been presented. Wind farm projects that will be developed under RESS will be enablers for local communities, allowing those communities to undertake community projects and initiatives that they could otherwise never have considered. To put what this new RESS community fund contribution in context, projects of the past might have contributed something in the region of €1,000-€1,250/MW per annum to a local community fund. A 30MW wind farm might (because such community funds were never mandatory) have contributed something between €30,000 and €35,000 per annum. Under RESS, the same 30MW wind farm would be contributing something in the region of €150,000 per annum to the local community fund. Every 100MW of wind energy developed in County Galway under RESS, will result in approx. €500,000 of community fund contributions per annum, or €7.5 million over the 15-year life of the RESS contract. These community funds will financially support local projects and initiatives that would otherwise fall to Galway County Council to fund and support.

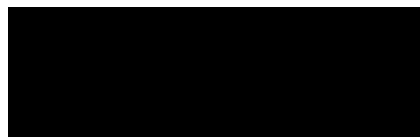
The key message we would like this submission to deliver is the need for ambitious planning policy and an ambitious Renewable Energy Strategy as part of the new County Development Plan, that will allow a significant amount of the county's untapped wind energy potential to be harnessed over the lifetime of the next plan. The scale of the challenge ahead to reverse the current course of climate change and transition to a low carbon and then a carbon neutral economy, is enormous. The wind energy resource of County Galway is also enormous and represents an enormous opportunity for County Galway if facilitated by supportive planning policies and an ambitious Renewable Energy Strategy.

We look forward to engaging further with future stages in the process of preparing the 2022-2028 Galway County Development Plan, and if required, would be happy to provide further details or information to Galway County Council on anything referred to in this submission.

Yours sincerely,



Brian Keville B.Sc. (Env.)
Environmental Director



Gus McCarthy BA MRUP MIPI
Planning Director

