



Ref: Submission on Draft Wicklow County Council Development Plan 2021 – 2027

To whom this may concern,

RWE are pleased to have the opportunity to have our consultation response submission considered in respect of the Draft Wicklow County Development Plan 2021 - 2027

RWE Renewables Ireland is operating and developing a number of renewable projects in Ireland, across a range of renewable energy technologies including onshore wind, offshore wind and battery storage. RWE is now one of the world's leading producers of renewable energy and stands as the world's second largest offshore wind developer and third largest provider of renewable electricity across Europe, with a wealth of experience. RWE have contributed to the WEI Submission and fully support this.

If you have any questions regarding our response, please do not hesitate to contact me.

We look forward to engaging in the next stages of this consultation process.

Yours faithfully,

Riain O'Callaghan

Graduate Renewables Developer

*online submission bears no signature

RWE Renewables Ireland Ltd

1. Carbon Emissions and Renewable Energy Targets

On the 9th August 2021, the Intergovernmental Panel on Climate Change (IPCC) published its 6th Assessment Report (AR6) with the overarching assertion that, “It is unequivocal that human influence has warmed the atmosphere, ocean and land”. This report confirms with alarming certainty the detrimental and linear relationship of CO₂ emissions and global temperature rise in D1.18 :

“This Report reaffirms with high confidence the AR5 finding that there is a near-linear relationship between cumulative anthropogenic CO₂ emissions and the global warming they cause.....This relationship implies that reaching net zero anthropogenic CO₂ emissions is a requirement to stabilize human-induced global temperature increase at any level, but that limiting global temperature increase to a specific level would imply limiting cumulative CO₂ emissions to within a carbon budget.”

The detrimental effects of rising global temperatures are evidenced in regionally intensified weather patterns. Severe heat waves that happened only once every 50 years are now happening roughly once a decade. Tropical cyclones are getting stronger. Most land areas are seeing more rain or snow fall in a year. Severe droughts are happening 1.7 times as often while fire seasons are getting longer and more intense. Ireland is not immune to these climatic changes, with average temperatures exceeding long-term averages in 23 of the past 25 years. The urgency with which Ireland and the rest of the world need to tackle climate breakdown is clear and reflected in our national targets outlined below, with the electricity sector a key component in reaching decarbonization.

The criticality of onshore wind in Ireland’s energy mix is apparent when the near-term trajectories in the Clean Energy Package Governance Regulation (2019) 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. Section (34) of the document notes (emphasis added):

“Integrated national energy and climate plans should be stable to ensure the transparency and predictability of national policies and measures in order to ensure investment certainty. National plans should however be updated once during the ten-year period covered to give Member States the opportunity to adapt to significant changing circumstances. For the plans covering the period 2021 to 2030, Member States should update their plans by 30 June 2024. Objectives, targets and contributions should only be modified to reflect an increased overall ambition in particular as regards the 2030 targets for energy and climate. As part of the updates, Member States should make efforts to mitigate any adverse environmental impacts that become apparent as part of the integrated reporting”.

In addition, on 17th June 2019 the Government published the ‘Climate Action Plan 2019’ (CAP). This sets out the agreed course of action over the coming years to tackle climate breakdown. It is a visionary and transformational plan and at its heart recognises that “We [Ireland] are close to a tipping point” and “decarbonisation is now a must if the world is to contain the damage and build resilience in the face of such a profound challenge.” (Exec. Summary pg. 8). In particular, the CAP places the decarbonisation of the electricity sector at the centre of its ambitions. In real terms it

mandates this sector to move from 12 million tonnes of CO2 equivalent emissions in 2017, to 4.5 million tonnes by 2030. In other words, a massive reduction of 7.5 million tonnes (62.5%).

Other sectors, namely transport, the built environment, agriculture and industry are also tasked with significant CO2 emission reductions but of a comparatively lower order namely 37.5%, 31.25%, 7.5% and 6.25% respectively. This makes transforming the electricity sector the single greatest lever in the CAP in terms of CO2 reduction (Ref. EirGrid Strategy Launch 2019, CEO presentation).

The 2019 CAP provides a roadmap of what must be achieved and in relation to electricity, requires 70% of all our demand to come from renewable energy sources by 2030. This almost doubles the previous target of 40% by 2020. To achieve the 70% target, the CAP earmarks a target of 3.5GW offshore wind and a doubling of existing on-shore wind from circa 4GW (today) to 8.2GW by 2030, signalling onshore wind as crucial in the roadmap to decarbonization.

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 2027.

It should be noted the 2020 programme for government commits to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) and to move to net zero emissions by 2050. The 2050 target was set into law by the Climate Action and Low Carbon (Amendment) Bill 2021 as passed through the Oireachtas and signed into law 23rd July, 2021. This increases the CAP offshore target to 5GW; proposes a strengthened role for the Climate Change Advisory Council, proposes an annually revised Climate Action Plan and new oversight and accountability by the Oireachtas. Every sector, including the energy sector, must contribute to meeting the 2050 target by implementing policy changes as outlined throughout the programme for government.

RWE believes that planners working in all tiers of government (national, regional, local) and the planning profession in general needs to step forward and frame this national CO2 reduction ambition and the associated requirement for renewable energy, in the form of plan-led 'Renewable Energy Strategies' (RESs) as an utmost priority.

The targets discussed will not be achievable without a functioning onshore wind sector, and there is likely to be considerable reliance on wind to deliver on our intermediate targets to 2025 and 2027. Given the relatively high likelihood that a significant portion of new offshore capacity will only start to be delivered onto the system post 2027, (and in volumes that may fall short of the targets set out in the NECP), these requirements clearly point to a need to maintain focus on the delivery of new onshore capacity, which will be better placed to support these earlier intermediate targets, in addition to making a material ongoing contribution to the long term decarbonisation targets.

2. Chapter 7: Social and Community Development

The Energy Sector is a key sector for job growth, throughout the lifetime of the Plan. Wind Energy development can generate significant construction and operation jobs throughout its lifetime and contribute to rural communities through community benefit funds and to the local authority through rates.

RWE is also committed to ensuring that local communities' benefit from having a wind farm in their locality in terms of a Community Benefit Fund which supports the development of local recreation amenities and provides additional community project funding. Community benefit schemes relating

to RESS projects will have significant community benefit, providing an opportunity to transform rural communities where projects are located. The Public Consultation on Good Practice Principles for Community Benefit Funds under the RESS[1] published 30th March 2021 provided welcome guidance on Community Benefit Funds administration, structure, and quantity, indicating a 50MW project will create approximately €300,000 annually. We are also working hard around Community Investment and examining how communities could be given the opportunity to invest in a wind farm project.

3 Chapter 9: Economic Development

Wind Energy Ireland (WEI) statistics confirm that in terms of initial capital investment, every megawatt (MW) of wind energy capacity installed gives rise to an investment of approximately €1.25 million. Ongoing investment and economic development benefits during the 30+ year operational lifespan of wind farms, take the form of rents payable to landowners, financial support for local communities in the form of community benefit schemes and commercial rates payable to local authorities. Combined, these amount to approximately €25,000 per MW per annum. A review carried out by WEI indicated over €1,000,000 was paid to the Council from wind farms in the form of commercial rates in 2020. Therefore, RWE believe that wind energy is of strategic importance to the county both in addressing Climate Change and in growing the Wicklow economy and providing employment opportunities in both rural and urban communities.

4 Chapter 11: Tourism and Recreation

With regard to economic development and opportunity the LECP identified a number of objectives as follows:

9.1 Support the development of renewable energy and a low energy future for Wicklow.

The Local Economic Community Plan (LECP) recognises the need to prepare a maritime strategy for County Wicklow as a means to promote the County's marine assets in a sustainable manner. Several actions contained in the plan particularly aim at harnessing the potential of the County's marine assets, either built or natural. It specifically seeks to build on the potential of the County's ports and harbours to deliver improved marine commercial, tourism and leisure activities. As a result of this, Wicklow County Council has appointed consultants to assist the Council in delivering a Maritime Strategic Review for County Wicklow. There are 4 main strategic recommendations for developing County Wicklow's Marine Assets;

1. Establishing a strong offshore wind offering to ensure that County Wicklow takes maximum advantage of this emerging sector;
2. Exploring the feasibility of constructing a new outer harbour near Wicklow Port to attract international business and to larger scale industrial users such as offshore wind
3. Develop a plan for supporting aquaculture development;
4. Develop a dedicated marketing strategy for marine tourism.

Green Industry

CPO 9.21 To encourage and facilitate the development of 'green' industries, including industries relating to renewable energy and energy-efficient technologies, waste recycling and conservation.

CPO 9.22 To encourage and facilitate the development of off-shore wind operation and maintenance bases which will create new opportunities for employment and skills development. Such development is particularly suited to the redevelopment of brownfield harbour lands.

5 Chapter 19: Marine Planning and Coastal Zone Management

The Wicklow County Development Plan 2021-2027 covers a period that will see significant activity and development for offshore renewable energy in Ireland. Supported from coastal counties such as County Wicklow, offshore renewable energy developments have the potential to contribute in a major way to Ireland reaching its Climate Action Plan targets of 70% renewable energy by 2030. It is against this backdrop that we are especially invested in making this submission on Chapter 19 'Marine Planning and Coastal Zone Management of the draft Wicklow County Development Plan 2021 – 2027.

Section 19.0 'Introduction' of the draft Wicklow County Development Plan 2021 - 2027 includes 'energy production' in the list of examples of diverse activities and industries associated with the County Wicklow coastline. The acknowledgement of 'energy production' here is welcomed.

Discussion on climate change in Section 19.0 is also welcomed, as is the acknowledgement that offshore wind has a role to play in contributing to the County Development Plan's goals relating to 'climate action' and 'economic opportunity'.

Section 11.1 'Coastal Zone Management – Introduction' of the Wicklow County Development Plan 2016 -2022 included text which read as follows:

'..any objectives set out in this chapter shall override any other objectives set out in this plan.'

It is encouraging to see that this text is not included in Chapter 19 of the draft Wicklow County Development Plan 2021 – 2027. While RWE acknowledges the importance of effective coastal zone management, offshore wind farm developments will each be subject to Screening for Appropriate Assessment (in accordance with Article 6 of the Habitats Directive) and full Environmental Impact Assessment Report (EIAR – in accordance with the EIA Directive). The project-specific EIAR will accompany the consent application for each offshore wind farm development. The fact that the text set out in italics above is not included in the draft Wicklow County Development Plan 2021 – 2027 is seen as a meaningful acknowledgment of Ireland's Climate Action Plan targets and an acknowledgement of the critical nature of those objectives set out throughout the Plan that relate to supporting the development of renewable energy.

Section 19.1 'Legislative & Strategy Context' of the draft Wicklow County Development Plan 2021 - 2027 includes a sub-section dedicated to the 'National Marine Planning Framework' (NMPF). It is noted that this section will need updating now that the government's 1st July 2021 launch of the NMPF has taken place. Update of this subsection to reflect current status of NMPF will be key and the current acknowledgement in Section 19.1 that the 'County Development Plan must be consistent with the approved NMPF' is welcomed.

Section 19.1 'Legislative & Strategy Context' of the draft Wicklow County Development Plan 2021 - 2027 also includes a sub-section dedicated to the 'Marine Planning and Development Management Bill 2019'. It is noted that this section will need updating now that the 'Marine Planning and

Development Management Bill 2019' has been superseded by the 'Maritime Area Planning Bill 2021' (MAP Bill). The inclusion of a subsection specific to the Bill is welcomed though it is noted that update of this subsection to reflect latest status of MAP Bill will be key. It also noted that other references to the 'Marine Planning and Development Management Bill / Act', such as that in CPO 19.1 and CP19.2 (Section 19.4, pg 418), will also require update in light of the MAP Bill.

Section 19.2 'Local Context & Strategy' of the draft Wicklow County Development Plan 2021 – 2027 includes a sub-section entitled 'Marine Economy / Blue Economy'. The final paragraph of this subsection (pg 414) states:

'There is a significant opportunity for Wicklow to take advantage of the Offshore Wind Sector and any associated spin offs such as on-shore 'operations and maintenance' facilities and the creation of 'local offshore wind enterprise zones'.'

This acknowledgement of the significant opportunity for County Wicklow to benefit from the development of Offshore Wind is welcomed. Outside of the example of 'operations and maintenance', RWE would also like to highlight the opportunity for County Wicklow in hosting other onshore infrastructure associated with the construction, operation and decommissioning of large-scale offshore wind farms including but not limited to: temporary construction compounds; temporary lay-down areas for wind farm components; assembly areas for wind farm components; underground cabling from point of cable landfall at coast to point of connection; onshore grid connection points; and port & harbour infrastructure. It is requested that the text in italics above be expanded to acknowledge these other examples representing opportunity for County Wicklow, and to which County Wicklow's support is critical for the success of offshore wind ambitions off the County Wicklow coast.

Section 19.4 'Marine Spatial Planning and Coastal Zone Management Objectives' includes 27 no. objectives. We welcome the inclusion of 'renewable energy' in CPO 19.3, and the support for 'the development or expansion of port facilities' in CPO 19.6. We respectfully request that our comments and observations on the following objectives are incorporated into the final Wicklow County Development Plan 2021 – 2027:

CPO 19.2:

'To work with the Department of Housing, Planning and Local Government and other relevant government departments and bodies on marine planning with particular reference to the following areas;

- the implementation of the National Marine Planning Framework (following its adoption),
- the implementation of any future Marine Planning and Development Management Act in so far as it relates to the duties and functions of the Planning Authority,
- the designation of the nearshore area for County Wicklow,
- the preparation of any sub-regional plans for the maritime area and nearshore area.

With respect to the 3rd bullet point of CP19.2, 'the designation of the nearshore area for County Wicklow', we request that the commitment in the introductory paragraph is extended to work with 'renewable energy developers' also.

CPO 19.8 and CPO 19.9: CPO 19.8:

‘To protect the character and visual potential of the coast and conserve the character and quality of seascapes.’

CPO 19.9:

To strictly control the nature and pattern of development within coastal areas and ensure that it is designed and landscaped to the highest standards, and sited appropriately so as not to detract from the visual amenity of the area. Development shall be prohibited where the development poses a significant or potential threat to coastal habitats or features, and/or where the development is likely to result in undesirable patterns of erosion or deposition elsewhere along the coast.’

RWE recognises the importance of visual amenity as evidenced by the detailed Landscape, Seascape and Visual Impact appraisals carried out by its members as part of the renewable energy project development process. As such, RWE acknowledges the importance of inclusion of CPO 19.8 and CPO 19.9 in the draft Wicklow County Development Plan 2021 – 2027. So that these objectives also reflect the draft Wicklow County Development Plan’s support for offshore renewable energy development, we respectfully request that either:

- a) These specific objectives CPO 19.8 and CPO 19.9 be expanded to acknowledge the key role that offshore renewable energy development off the Wicklow coast has in helping Ireland achieve its renewable energy targets; or
- b) A new objective be added to Section 19.4 in support of the key role that offshore renewable energy development off the Wicklow coast has in helping Ireland achieve its renewable energy targets.

In conclusion, we applaud Wicklow County Council in recognising the offshore renewable energy sector in Chapter 19 of the draft Wicklow County Development Plan 2021 – 2027 and we respectfully request that our comments and observations detailed above are incorporated into the final Wicklow County Development Plan 2021 - 2027.

6 Appendix 5: Wicklow Wind Energy Strategy

RWE believes that planners working in all tiers of government (national, regional, local) and the planning profession in general needs to step forward and frame this national CO2 reduction ambition and the associated requirement for renewable energy, in the form of plan-led ‘Renewable Energy Strategies’ (RESs) as an utmost priority. RWE is familiar with Wicklow’s current Wind Energy Strategy (Appendix 5) and recognises the high quality of that document. We welcome the revision of the WES following and the updated Landscape Character Assessment (LCA) from 2003.

The targets discussed will not be achievable without a functioning onshore wind sector, and there is likely to be considerable reliance on wind to deliver on our intermediate targets to 2025 and 2027. Given the relatively high likelihood that a significant portion of new offshore capacity will only start to be delivered onto the system post 2027, (and in volumes that may fall short of the targets set out in the NECP), these requirements clearly point to a need to maintain focus on the delivery of new onshore capacity, which will be better placed to support these earlier intermediate targets, in addition to making a material ongoing contribution to the long term decarbonisation targets. RWE support policy objectives NPO 54 – 58 of the draft Plan.

RWE note that:

“In light of these requirements [Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (Dept. of Housing, Planning, Community and Local

Government) July 2017], for the purpose of this draft Development Plan (2021), it is not intended to review the Wind Energy Strategy as set out in the 2016 County Development Plan (other than updates to reflect current statutes or other clarifications) until new guidelines are made, and the 2016 WES is herewith subsumed in the 2021 County Development Plan.”

In the context of national government targets since 2016, the Draft Plan and subsequent RES need to set out more distinctly how the County will facilitate a proportionate level of the additional 4.2GW of onshore wind growth as a matter of priority and to comply with SPPR No. 2. The current RES fails to set out clearly how its policies and designations for renewable energy will contribute to the national renewable energy targets in a critical.

The absence of these specific targets and supporting policies fails to acknowledge that counties with renewable energy potential should do more than others with less potential and / or greater populations in order to achieve the Country’s national targets. In other words, all counties, including Wicklow, must focus on national targets not individual demands as previously outlined.

6.1 Policy Ambition

To-date, there does not appear to be any central Government or Regional Assembly guidance on how many MW or GW of new wind energy development each Local Authority like Wicklow and County Council will need to be making provision for. In this absence of such guidance, WCCC should seize the opportunity and seek to identify enough land to accommodate as much as possible of the additional 4.2GW of additional onshore wind energy required by the Climate Action Plan by 2030.

The quantum of land identified as potentially suitable for wind energy development must go far beyond the actual amount required, to allow for a natural attrition rate across development sites and projects.

To deliver 4.2GW of new wind energy capacity onshore by 2030 to meet the Climate Action Plan’s target, will require a sufficient quantum of land to accommodate many multiples of 4.2GW to be classified as suitable for wind energy. This multiple is required to allow for the natural attrition rate of the wind energy development process, where every site or area that has theoretical potential, cannot convert that theoretical potential into actual potential, as illustrated in the graphic opposite, taken from the SEAI Methodology for Local Authority Renewable Energy Strategies.

The theoretical resource is reduced for many reasons. Even where a site is considered suitable for a wind energy development in a WES, landowners may not be agreeable to accommodating a project on their lands. If landowners are agreeable, site-specific environmental constraints such as bird activity, peat depth/stability or a high concentration of neighbouring properties might rule a site out. If no such constraints exist, a project’s planning application could still be refused permission, or if granted, overturned on judicial review. If granted permission, a project may not be able to secure an economically viable grid connection or be able to find a route to market for its electricity that make the construction of the project a commercially viable proposition. These are just a few examples of the hurdles a project must clear to convert theoretical potential to actual, delivered capacity. To deliver 4.2GW of new onshore wind by 2030, is likely to require a quantum of land sufficient to accommodate 15-20GW of land to be identified as suitable for wind energy if we want to see 4.2GW actually delivered and connected based on a theoretical analysis and a view from WEI members on likely success rates.

RWE strongly suggests that the CDP and WES for Wicklow must classify a sufficient quantum of land as being suitable for wind energy, to ensure national renewable energy targets can be achieved, and demonstrate how the quantum of land classified as suitable is sufficient for this purpose. An example of suitable figures is outlined in section 8.3 of this submission. A clear policy ambition in the CDP and WES for County Wicklow is critical to guide the strategy and the identification of a sufficient quantum of potentially suitable land.

6.2 Methodology

Wicklow County Council will be aware of the Department of Housing, Planning and Local Government's (DHPLG) recent public consultation on the Draft Revised Wind Energy Development Guidelines, and specifically Chapter 3 of the draft guidelines on planning for wind energy development through the Local Authority development plans and wind or renewable energy strategies.

In a submission to DHPLG on the Draft Revised Wind Energy Development Guidelines by WEI, it has already suggested that the step-by-step guide outlined in Section 3.6 Draft Revised Wind Energy Development Guidelines should be strengthened to give clearer direction to planning authorities on the need to consult with neighbouring planning authorities to ensure a consistent approach across county boundaries, and that this interaction with adjoining Local Authorities be made a mandatory part of the preparation of the WES. RWE notes that while the County Development Plans and Wind Energy Strategies of adjacent counties have been reviewed by Wicklow County Council, we encourage the Council to engage with the adjacent County Councils to ensure a consistent approach is taken across county boundaries as each Local Authority moves to prepare or review its WES.

When finalising the new WES for Wicklow, RWE urges Wicklow County Council not to consider the following potential constraints or facilitators in the process of identifying areas as being potentially suitable for wind energy developments:

1. Grid Capacity - Existing or planned electricity grid capacity should not be considered a constraint for the purposes of determining whether areas of County Wicklow are suitable or unsuitable for wind energy development. Grid capacity is a technical and electrical engineering constraint that is managed by the TSO/DSO and new infrastructure is often provided on the basis of there being a need to connect wind energy developments to the electricity grid, thereby further reinforcing grid infrastructure in counties where this work would not otherwise have occurred without wind energy development. However, given the extent of grid within the County, lack of grid capacity is not seen as a major constraint.
2. Wind Speed - Wind speed should not be used as a constraint for site suitability or unsuitability at the strategy preparation stage, as wind turbine technology is quickly evolving to be able to harness lower wind speeds than was not thought possible only a few years ago. The SEAI Wind Atlas of Ireland is also derived from a computer model and would not be as accurate as on site wind measurements which are used by wind energy developers to verify a site's wind regime as being viable. Therefore, for these two reasons, to exclude areas solely on the basis of wind speeds derived from a national wind atlas would be an overly conservative approach and would unnecessarily prevent a suitable classification being applied to what otherwise could be a perfectly viable site. The Draft RES indeed agrees with this, however areas of 7.5m/s at 75m and above were identified, excluding otherwise potentially available lands.
3. Nature Conservation Areas - Areas designated for nature conservation should also not be automatically excluded from accommodating new or repowered wind energy projects. This

is because, for example, in such constraints-led studies, Special Protection Areas (SPAs) would typically be deemed unsuitable. However, there is greater than 1GW (1,000MW) of wind energy developments currently in operation in SPAs within Ireland.

6.3 Landscape Capacity and Landscape Sensitivity

Historic Renewable or Wind Energy Strategies providing locational guidance for the siting of wind farms, have traditionally directed them towards landscapes of lower sensitivity. These lower sensitivity landscapes would generally be considered to have a higher capacity to accommodate wind energy developments, or in fact any type of development. As illustrated in Figure 6 below, the least sensitive landscapes would generally be considered to have the most capacity to accommodate development, while the most sensitive landscapes would generally be considered to have the least capacity to accommodate development. As decarbonisation and renewable energy ambitions increase, wind energy developments will have to extend from the least sensitive landscape areas with the most capacity, into areas of slightly more sensitive landscape.

The Government's Climate Action Plan will require a further 4.2GW of wind energy to be installed onshore by 2030. This additional 4.2GW will have to be located in areas of slightly greater landscape sensitivity than the 4GW already installed. However, there remains significant landscape capacity across the country and across County Wicklow to fulfil the State's onshore wind energy and renewable energy ambitions. The most scenic parts of County Wicklow can still be protected and deemed not normally permissible for wind energy in the new WES for Wicklow, but it will still be necessary to extend the areas that will be considered suitable for wind farm development into slightly more sensitive landscape areas if we are to deliver on the requirements of the CAP over the coming decade.

6.4 Regional Approach

RWE acknowledges that Wicklow County Council is only responsible for its own functional area and that the new CDP and WES for Wicklow will only extend as far as the Wicklow boundary. RWE has been advocating for a regional approach to the spatial planning of wind farm developments for some time, to compliment the Local Authority-level approach that has been the case to-date. WEI previously prepared a Discussion Document on this specific topic which outlines the following benefits of a regional approach:

- It fits within and neatly compliments the Regional Spatial and Economic Strategies (RSES) now prepared for the three regions. (As the three RSES policy documents have now been formally adopted, spatial plans for renewable energy projects can be progressed as supplementary work streams by the Regional Assemblies and compliment the RSES)
- A single, consistent methodology can be used across an entire region and across all three regions in the country, including across county and local authority boundary areas where approaches to-date have been inconsistent in many cases.
- A regional approach would ensure that the optimum locations for wind energy development are identified, and every county's potential is assessed in a regional and national context, in direct comparison with the rest of the region.
- It would ensure that national targets, objectives and requirements for the delivery of wind energy, directly translate into the identification of suitable areas and corridors, and a sufficient quantum of land is identified and deemed appropriate to ensure national targets, objectives and requirements can be delivered.

- Landscape sensitivity, value and capacity can be assessed on a broader, regional scale, rather than just within the sometimes-limited confines of an individual county. This would provide consistent, evidence-based landscape policies across local authority areas, and ensure the appropriate landscape policies are implemented irrespective of the county boundaries. This would ensure that wind and other electricity infrastructure projects that span or are visible across county boundaries, can be assessed in a consistent landscape policy context.
- Landscape sensitivity and capacity assessments could be undertaken for wind energy and other electricity infrastructure on a regional basis, without needing the National Landscape Strategy to be completed. While the National Landscape Strategy will have to provide for all forms of development and types of land uses, the assessment of landscape sensitivity and capacity specifically for wind energy and electricity infrastructure is a much more defined work stream, that could be progressed in advance. Existing Local Authority landscape policies can be used to align landscape values across a region, to ensure existing local policy is fully considered when moving to a regional approach for the assessment of landscape sensitivity and capacity for wind energy and other electricity infrastructure.

A regional approach to the spatial planning for wind energy was suggested by WEI as far back as March 2018 and is still considered vital if the transition to a low carbon economy in the coming years is to be successful. RWE maintains it is essential to plan for this transition, on the basis of the three Regional Assembly areas, in addition to the 31 Local Authority areas as has been the case to-date. The regional approach would undoubtedly provide a more appropriate platform for ensuring national policy can be transposed effectively to local level, and ensure a consistent approach is used across the entire country that reflects Government policy.

In addition to the Local Authority-based approach to incorporating renewable strategies into their respective development plans, to compliment the Renewable Electricity Policy and Development Framework (REPDF) currently being prepared by the Department of Communications, Climate Action and the Environment (DCCA), RWE will continue to advocate for the preparation of Regional Renewable Energy Strategies to be accelerated and prioritised by the three Regional Assemblies. Only the Regional Renewable Energy Strategies can ensure that a sufficient quantum of land within each region is identified as having wind energy potential sufficient to meet the national requirements.