



County Development Plan Review,  
Planning Department,  
Wicklow County Council,  
Station Road,  
Wicklow Town

Online submission via public consultation portal

25<sup>th</sup> May 2022

Dear Sir/Madam,

**Re: Wicklow County Development Plan - Material Amendments**

Wind Energy Ireland (formerly Irish Wind Energy Association) welcomes the opportunity to make this submission on the Material Alterations to the draft Tipperary Development Plan 2022-2028.

As of 2021, The Climate Action Plan ('CAP') requires **80% of our electricity is generated from renewable sources by 2030 with a target of up to 8,000MW of onshore wind**. This almost doubles today's production.

There is a strong chance that most of the offshore generation will be delivered post 2027. Indeed, the regulatory framework is yet to be formally established. This lead in time has the potential to risk meeting the targets set out in the National Energy Climate Plan 2021. This underscores the importance and reliance of onshore wind, particularly for the lifetime of this plan to 2028.

The criticality of onshore wind in Ireland's energy mix is further apparent when the near-term trajectories in the Clean Energy Package Governance Regulation are considered. This states that Member countries must set a trajectory for their total 2030 share of energy from renewable sources at 18%, 43% and 65% in 2022, 2025, 2027 respectively.

There is a definitive policy signal for renewable energy ambition levels to continue increasing before 2030. This is made clear by the 10% increase in our national target from 70% to 80% at the end of 2021. This also indicates that onshore wind energy will continue to have the critical leading role that it has in the CAP 2021. Moreover, in early March 2022 the European Commission made an announcement addressing energy security issues emerging from Russia's invasion of Ukraine<sup>1</sup>. It indicated that the EU intends to considerably quicken its shift to clean energy in order to increase Europe's energy independence and "*will publish a recommendation on fast permitting for renewable energy projects and will work to support the use of all flexibilities already granted by EU legislation and the removal of remaining obstacles, whatever their origin*" (page 9). In addition, member states will be required to

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<sup>1</sup> Communication from the Commission to the European Parliament to the European Council, the Council, The European Economic and Social Committee and the Committee of the Regions: **REPowerEU: Joint European Action for more affordable, secure and sustainable energy**. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2022%3A108%3AFIN>

swiftly map, assess and ensure suitable land and sea areas are available for renewable energy projects, commensurate with their national energy and climate plans. It is wholly apparent from national and EU policies, and based on current trajectories, that onshore wind is a critical form of infrastructure which is essential to address our climate and energy security crises.

Material Amendment VI-64 states that the development plan “*aims to put in place the appropriate supports that will allow County Wicklow to contribute its share of the additional on-shore national renewable electricity target, which is estimated to be 255MW*”. The accompanying footnote clarifies that the 255MW target equates to 3% of the total onshore national growth requirement and is calculated based on County Wicklow’s % of the total land mass of the Republic of Ireland.

WEI note that +255MW equates to 3% of 8.5GW and this is therefore Wicklow’s combined onshore renewable target for the county (i.e., wind, solar and others). A specific onshore wind target has not been set out in this proposed amendment.

It is a requirement under Specific Planning Policy Requirement In the “*Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, (Dept. of Housing, Planning, Community and Local Government) July 2017*, that the County Development Plan indicates how it will contribute to reaching our national targets on renewable energy and climate change mitigation. Of particular importance, as discussed above, is the wind energy production and the potential wind energy resource (in megawatts). In determining the potential wind energy resource, we would suggest an analysis of the 2016 Wind Energy Strategy and Wind Energy Map is critical to inform this potential and this should be brought forward into the new Plan. **The proposed target based on land mass does not fulfill the potential wind energy resource of the proposed Plan.**

We recognise that the Draft Plan (Section 16.2.1.1 – Wind Energy) clarifies its position in relation to its Wind Energy Strategy and states “*It is the policy of the Council to maximise wind energy development within the County in all three of these areas<sup>2</sup>, on a case by case basis, subject to meeting specific requirements and guidance contained within the strategy.*” WEI welcome this policy statement.

We note the existing Wind Energy Strategy (WES) is being carried forward and that the planning authority has committed to reviewing it once the new National Wind Energy Guidelines are issued. (Draft Plan Section 16.2.1.1 – Wind Energy<sup>3</sup>). Nevertheless, we request that a corresponding clear policy objective is added to the Draft Plan to guarantee this is available as soon as possible.

It is our view that the revised onshore wind target cannot be recommended in the absence of reviewing the 2016 RES and the associated WES to confirm the new target is achievable. To ensure the target is appropriate, the WES and policy designation areas in the associated map must be reviewed to ensure alignment. Evidence of this review is not apparent and without this analysis the target is theoretical.

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<sup>2</sup> *Most favoured, least favoured, not favoured.*

<sup>3</sup> It is not intended to *update, amend or review the Wind Energy Strategy (WES) as set out in the 2016 County Development Plan until new guidelines are made, and the 2016 WES is herewith subsumed in this County Development Plan.*” It goes on to state that “*upon the making of any new guidelines, the WES and the provisions of the County Development Plan relating to Wind Energy will be updated if required.*”

We note the proposed amendment confirms the new target will be reviewed subsequent to the emergence of regional targets. The criticality of delivering additional onshore wind in the near term has been discussed above and is necessary to ensure energy security. This highlights the importance of setting realistic and achievable targets today.

As discussed in section 6.3 of our previous submission on the draft plan, we believe it will be necessary to extend current areas suitable for renewables into lightly more sensitive landscape areas across the country in order to meet our 8,000MW target by 2030. This point will become more important as Wicklow moves towards maintaining the existing operational wind farms<sup>4</sup>, all of which are currently operating in areas currently designated as “*less favoured*” in the 2016 WES.

The experience of WEI members has been that there are opportunities in landscapes of moderately higher sensitivities to incorporate existing and additional wind farms appropriately in a manner that does not adversely affect the landscape. Disparities between local and regional landscape sensitivities can lead to inconsistent land designations. Considering this, we support policies for additional wind farms in sensitive areas in the revised WES and Wind Energy Map are not excluded on this basis. We suggest a detailed site-specific assessment of both technical constraints / opportunities and landscape / visual amenity impacts, including potential to impact on the designated Protected Views and Scenic Routes in the County Development Plan are required to fully assess a wind farms suitability in a sensitive area. This will ensure Wicklow maximises its contribution to national targets, while simultaneously ensuring impacts on landscape and visual amenity are considered at a site-specific level as an utmost priority.

**We requested the following points in our submission on the Draft Plan and believe they are still valid for consideration at the amendment stage:**

- **Ensure that policies for new wind farms in sensitive landscape areas are not exclusionary but rather require a detailed site-specific assessment of both technical constraints/opportunities (such as site size, proximity to sensitive receptors) and landscape/ visual amenity impacts, including potential to impact on the designated Protected Views and Scenic Routes in the County Development Plan. This will ensure Wicklow maximises its contribution to national targets, while simultaneously ensuring impacts on landscape and visual amenity are considered at a site-specific level as an utmost priority.**
- **Review the 2016 RES and associated 2016 LCA as part of the current Draft Plan making process to address the urgency of climate action as expressed in the 2030 targets.**

WEI thank you for the opportunity to engage with the consultation process on the proposed material amendments and welcome further discussion or clarifications on any of the above points.

Yours sincerely,

[online submission]

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<sup>4</sup> This point was discussed further in WEI’s previous submission on the Draft plan (section 6.3)

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**ENDS**