

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

Online submission via public consultation portal

23rd May 2022

Dear Sir/Madam,

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

Thank you for providing an opportunity to consult on the above matter. This submission is made on behalf of FuturEnergy Ireland.

FuturEnergy Ireland (FEI) is the recently launched joint venture company owned on a 50:50 basis by Coillte and ESB. This collaboration combines the State's strongest assets and expertise in onshore renewable energy development on behalf of the people of Ireland. We are one of the largest dedicated developers of onshore wind in Ireland and our mission is to maximise the potential of our national resources and accelerate Ireland's transformation to a low carbon energy economy.

**Importance of Onshore Wind**

The Climate Action Plan (CAP) 2021 requires 80% of our electricity to come from renewable sources by 2030 comprising up to 8,000MW of onshore wind, approximately doubling the present installed capacity today. FEI is currently targeting the delivery of 1,000 MW of new onshore wind projects in this period, largely enabled by the Coillte landbank across Ireland.

Given the relatively high likelihood that a significant portion of new offshore capacity will only start to be delivered onto the system post 2028 and with a regulatory framework which is only becoming operational, there is real potential that anticipated renewable electricity volumes may fall short of the targets set out in the National Energy Climate Plan 2021<sup>1</sup>. Such a likely scenario therefore increases the reliance on onshore wind. We have a strong track record of working with the Wicklow Council and its Authorities in respect of onshore wind, most notably in the Raheenleagh Wind Farm, delivered in partnership with ESB by the predecessor business to FEI when it sat wholly within the Coillte Group. We hope we can now build on that successful relationship at a time of heightened climate emergency and action.

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

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<sup>1</sup> <https://www.gov.ie/en/publication/0015c-irelands-national-energy-climate-plan-2021-2030>

Member States 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 could not be a stronger policy signal that renewable energy ambition levels will continue to increase over the course of the decade, as evidenced by the recent increase in our national target from 70% to 80% late last year, and that onshore wind energy will continue to have the vital and leading role that it currently has in the Climate Action Plan 2021. Furthermore, in early March 2022 the European Commission made an announcement addressing energy security issues emerging from Russia's invasion of Ukraine<sup>2</sup>. It revealed that the EU intends to drastically accelerate its transition to clean energy thereby increasing Europe's energy independence. In addition, Member States will be required to swiftly map, assess and ensure suitable land and sea areas are available for renewable energy projects, commensurate with their national energy and climate plans. These are currently termed as 'go-to' areas, further detail in respect of which and the wider 'REPower EU Plan'<sup>3</sup> was included in the Commission's recent update of 18 May 2022. This increased the headline 2030 target for renewables from 40% to 45% and one of the three central pillars to this is accelerating the roll out of renewables including identifying suitable areas on and offshore and shortening permitting processes.

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. Our company has a strong record of responsible development and delivery of renewable energy infrastructure of scale which can play a meaningful role in climate action, while also mitigating against security of supply concerns, and making a lasting impact on local communities through benefit funds, rates contributions and unique amenity offerings.

### **Material Amendments VI- 64**

This proposed amendment 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 associated footnote confirms that the 255MW target equates to 3% of the total onshore national growth requirement and is calculated based on County Wicklow's percentage (%) of the total land mass of the Republic of Ireland.

We note that +255MW equates to 3% of 8.5GW and this is therefore Wicklow's combined onshore renewable target for the county (ie. wind, solar and others). A target for onshore wind in MW has not been specifically set by this proposed amendment.

It is also important to note that 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 Plan indicate how it will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular the wind energy production and the potential wind energy

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<sup>2</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>

<sup>3</sup> [REPowerEU \(europa.eu\)](https://europa.eu/repowereu)

resource (in megawatts). In order to determine the potential wind energy resource, it is necessary to analyse the 2016 Wind Energy Strategy and the Wind Energy Map that is being brought forward into the new Plan. This does not appear to have been done. In short, a proposed target based on land mass only, does not indicate the actual potential wind energy resource of the proposed Plan.

Notwithstanding this 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>4</sup>, on a case by case basis, subject to meeting specific requirements and guidance contained within the strategy.”* We 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>5</sup>). Notwithstanding this commitment, or indeed in light of it, we request that a corresponding clear policy objective is added to the Draft Plan to ensure this is forthcoming in a timely manner. For example, a policy that the WES will be reviewed, updated and amended within 18 months of publication of new National Wind Energy Guidelines.

### **Community and Economic Development**

As the Council is aware, the Energy Sector is a key sector for job growth throughout the lifetime of the Draft Plan. Wind energy developments can generate significant construction and operation jobs throughout its lifetime and significantly contribute to rural regeneration through the provision of local community benefit funds and local authority rates contributions.

In relation to communities, FuturEnergy Ireland operates a ‘Fair Play Model’ of engagement that commits to transparent dialogue and the sharing of information on an on-going basis with those most impacted by proposed developments. This model places greatest focus on the residents of dwellings within 2km of any development area and recognises the need to ensure people located further away from the development are informed as details become more defined.

FuturEnergy Ireland is also committed to ensuring that local communities benefit from having a wind farm in their locality in terms of a Community Benefit Fund that 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 and provide an opportunity to transform rural communities where projects are located. A good example includes recreational facilities at Sliabh Bawn Wind Farm in Co. Roscommon ([www.sliabhbawnwindfarm.ie](http://www.sliabhbawnwindfarm.ie)).

The Public Consultation on Good Practice Principles for Community Benefit Funds<sup>6</sup> under the third Renewable Energy Support Scheme (RESS3) published 30<sup>th</sup> March 2021, provided welcome guidance

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<sup>4</sup> *Most favoured, least favoured, not favoured.*

<sup>5</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.”

<sup>6</sup> DoECC, 2021 “Community Benefit Funds – Good Practice Principles Handbook”

on Community Benefit Fund administration, structure and quantity, indicating that a 50MW project will provide approximately €300,000 to the local community annually.

FuturEnergy Ireland is an active member of the Wind Energy Ireland (WEI, formerly IWEA) and our team members actively participate in several of the Association's committees and the Board of the organisation. 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 plus 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.

We are also working hard around Community Investment and examining how communities could be given the opportunity to invest in a wind farm project.

In summary, FuturEnergy Ireland believes that onshore wind energy is of strategic importance to the county in addressing climate change, growing the Wicklow economy and providing employment opportunities in both rural and urban communities.

### **Working in Partnership on Wind Projects**

The scale of the overall Climate Action Plan ambition is substantial and requires considerable collaboration between all parties involved or associated with renewable energy including the communities that will ultimately host the infrastructure. FEI has an experienced team in wind farm planning and development and is available to work in partnership with Wicklow County Council to support the realisation of the Climate Action Plan targets.

### **Conclusion**

It is critical that we increase our renewable energy deployment levels and remove fossil fuels from our society. Onshore wind is critical to meeting targets in our Climate Action Plan 2021 as well as our interim national targets between now and 2030. We request the Council to include a new policy in its Plan confirming that its Wind Energy Strategy will be reviewed, updated and amended within 18 months of the publication of new National Wind Energy Guidelines.

We thank you for the opportunity to provide feedback on the material amendments through the current consultation process. We would be happy to participate in any further engagement on this matter, including to discuss any aspect of our response, or to clarify any matters arising, should that be of assistance.

Yours sincerely,

[sent by email]

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