

WEDG Review Submissions,
Planning Policy and Legislation Section
Department of Housing, Planning and Local Government,
Custom House,
Dublin 1,
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[Sent by email: WEDGReview@housing.gov.ie]

18 February 2020

Reference: Draft Revised Wind Energy Development Guidelines 2019.

A Chara,

The Irish Planning Institute welcomes the publication of the Draft Revised Wind Energy Development Guidelines and the intention of the Department to underpin and support a proactive approach to renewable wind energy development in Ireland.

The submission will present comments of the Institute in the following sections:

- Regional Planning;
- Asset-Based Approach;
- Designated Areas;
- Community Investment and Community Dividend;
- Noise and Shadow Flicker; and
- Promoting Repowering on Established Wind Energy Sites.

Regional Planning

- The Institute notes that the Guidelines suggest a minimal role for the Regional Assemblies in relation to policy on wind energy projects. It is considered that in order for County wind energy strategies to be optimised to support rural investment and aspire to clear targets for outputs an integrated and coordinated Regional level renewable strategy is required. The regional strategy would spatially identify areas for wind energy development *inter alia* to coordinate ‘preferred areas’ across county boundaries and set targets. It is envisioned that these Regional renewable energy strategies would complement and integrate with the Department of Communications, Climate Action and Environment Renewable Electricity and Policy Development Framework (REPDF). In this regard, it should be noted that the Southern, Eastern and Midland, as well as the Northern and Western Region’s Regional Spatial and Economic Strategies (RSESs) all contain objectives which support a regional approach to the identification of renewable energy sites or the provision of a regional renewable energy strategy. The relevant objectives are summarised below:
 - RPO 4.16 of the Northern & Western Regional Assembly RSES (adopted 24th January 2020) states that the regional assembly will “...*co-ordinate the identification of*

potential renewable energy sites of scale in collaboration with Local Authorities and other stakeholders within 3 years of adoption of the RSES”,

- RPO 7.35 of the Eastern & Midland Regional Assembly RSES (adopted 28th June 2019) states that the Regional Assembly “... shall in conjunction with local authorities in the region identify strategic Energy zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas....”,
- RPO 94 of the Southern Regional Assembly’s RSES (adopted 31st January 2020) states that “It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders.”
- The Institute further observes that demonstration of compliance with SPPR 1 may be ineffective for Local Authorities in the absence of clear renewable energy targets on a regional basis. The Institute, therefore, advises that SPPR1 should be implemented at a Regional level providing directional targets to County wind energy strategies.

Asset-Based Approach

- The Institute suggests an asset-based approach in the location of wind energy development. The asset-based criteria underpinning the methodology comprising *inter alia* wind resources, population, infrastructure and landscape capacity. The coordinated and integrated development of wind energy in the optimum locations and the achievement of pre-designated targets can be planned at a national level through the Regional Spatial and Economic Strategies.

Designated Areas

- The IPI supports the spatial ‘traffic lights approach’ in the identification on development plan maps of the three types of areas. It is proposed that the development plan would provide a clear rationale for the choice of these areas based on an asset-based approach which would be compliant with Regional renewable energy strategy.
- The Institute recommends reference to ‘relatively small scale’ (the investigation for relatively small-scale wind energy developments within urban and industrial areas) be removed from the guidelines. The rationale for the scale of the project can be defined at a Regional or County level.

Community Investment and Community Dividend

- It is considered that the best return to the rural economy, rural communities and to the positive promotion of wind energy development in Ireland is through a clearly defined and economically viable ‘Community Investment Scheme’ whereby facilitating local communities/individuals to be investors of wind energy in their areas. The guidelines need to be explicit in this regard.
- It is considered that the rationale supporting the proposed investment/benefit/dividend scheme be clearly articulated, including the distinction between wind energy infrastructure and other infrastructural projects such as roads, solar parks, etc. It is further considered that the planner accessing the proposal would need a broad understanding of viability in the negotiation of planning gain in complying with the guidelines to provide community investment/benefit/dividend. Furthermore, policing of the ‘community planning gain’ by way of condition would require robust statutory underpinning.

Noise & Shadow Flicker

- The Institute recommends that wind energy development guidance is evidence-based in order to meet the Climate Action Plan 2019 onshore wind energy targets. In particular, the Institute would cite robust technical guidance and clarity in the area of acoustics and shadow flicker.

Promoting Repowering on Established Wind Energy Sites

- A clear distinction is required between the guidance criteria for new wind energy sites and existing established wind energy sites, which can be repowered to achieve greater efficiency and increased power generation. The application of the criteria to established sites would inhibit their renewal and substantially reduce the potential of these locations to contribute to wind energy targets.

The Institute would welcome the opportunity to meet and discuss the issues outlined above, should the Department consider it necessary to do so.

Yours sincerely,

A handwritten signature in black ink that reads "Brian Keane". The signature is written in a cursive, slightly slanted style.

Brian Keaney MIPI

Vice President 2020 - 2021

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