

Chief Executive's Report on the Submissions and Observations Received on the Draft Wexford County Development Plan 2021-2027

April 2021

BOOK 5

- Volume 10 Energy Strategy

Volume 10 Energy Strategy

Relevant Submissions

WXF-CE-10 (GSI)
WXF-CE-16 (Tony Dennison)
WXF-CE-34 (TII)
WXF-CE-35 (Jim Hurley)
WXF-C3-77 (Harmony Solar)
WXF-C3-94 (Wexford Environmental Network (WEN))
WXF-C3-109 (3CEA)
WXF-C3-116 (Coillte)
WXF-C3-135 (ESB)
WXF-C3-136 (IWEA)
WXF-C3-143 (An Taisce)
WXF-C3-144 (Terra Solar II)
WXF-C3-164 (Office of Planning Regulator (OPR))
WXF-C3-166 (Failte Ireland)
WXF-C3-167 (Eirgrid)
WXF-C3-168 (SEE)

Summary of Main Issues and Chief Executive's Response

Section 1.1 Introduction

Submission WXF-C3-168 (SEE). The section of draft CDP which references Great Island should be amended to “The use of gas for electricity generation will reduce during the 2020s and subsequent decades as Ireland seeks to reach net zero emissions by 2050. Great Island will continue to provide security of supply in support of this higher renewables penetration”.

Section 1.1 Introduction Chief Executive's Response

The submission of SSE is noted. It is considered that the existing text that Great Island CCGT provides security of supply up to 2030 adequately addresses the issue. No change recommended.

It is considered that no amendment is required.

Section 1.3 Strategic Aims of the Energy Strategy

Submission WXF-C3-109 (3CEA) considers that energy efficiency when coupled with renewable energy sources can make a substantial difference and potentially fast-track progress towards achieving its energy and carbon reduction targets.

Submission WXF-C3-116 (Coillte) and submission WXF-C3-167 (Eirgrid) welcome the strategic aims of section 1.3 of the strategy.

Section 1.3 Strategic Aims of the Energy Strategy Chief Executive's Response

The submission of WXF-C3-109 (3CEA) notes that energy efficiency when coupled with renewable energy sources can make a substantial difference and potentially fast-track progress towards achieving its energy and carbon reduction targets has merit.

It is recommended to amend bullet point one of the strategic aims (page 5):

Section 2.1 Summary of EU and Irish Guidance and Policy Documents

Submission WXF-C3-109 (3CEA) and submission WXF-C3-167(Eirgrid) note that some of the policy documents is out-dated.

Section 2.1 Summary of EU and Irish Guidance and Policy Documents Chief Executive's Response

The submissions of WXF-C3-109 (3CEA) and WXF-C3-167(Eirgrid) to update the policy documents are accepted. The National Energy and Climate Plan 2021-2030 is now in place. The National Mitigation Plan has been struck out by court order.

It is recommended to amend the text.

Section 2.2 Summary of Regional and Local Policy and Action Plans

Submission WXF-C3-109 (3CEA). An energy policy has recently been endorsed by the Council and details the commitment to energy management and climate action, available on Council website.

Submission WXF-C3-116 (Coillte) strongly supports the development of a regional renewable energy strategy to complement local authority approach (as per RPO 98 and 99 of the Southern RSES). In finalising the draft strategy, it is suggested that the Council work closely with neighbouring local authorities, and that a regional steering group should be persued. A set of guiding principles should be used by all local authorities and the SEAI's Local Authority Renewable Energy Strategy 2013, remain valid and should be considered.

Section 2.2 Summary of Regional and Local Policy and Action Plans Chief Executive's Response

Submission WXF-C3-109 (3CEA) has highlighted the Council's energy policy which commits to achieving targets of 50% improvements in energy efficiency and 30% reduction of carbon emissions by 2030. This is consistent with the strategic aims of the Energy Strategy as already detailed.

The Council is supportive of working closely with neighbouring local authorities and is supportive of developing a regional renewable energy strategy as suggested by the WXF-C3-116 (Coillte) submission. The Council has already engaged with neighbouring local authorities in this regard and will continue to do so.

It is considered that no amendment is required.

Section 3.3 Renewable Energy Targets

Submission WXF-C3-109 (3CEA). Per submission, the strategy is updated to reflect the NECP 2021-2030.

Submission WXF-C3-77 (Harmony Solar). The target of 46.5MW for solar PV should be an absolute minimum and should be increased. The measurement should be based on installed MW rather than planned MW given projects may not be developed.

Submission WXF-C3-116 (Coillte). It is noted that Table 5 of the strategy (volume 10) equates to a 213.5MW of onshore wind in order to reach 53.8% RES-E. It should be noted that the NECP 2021-2030 was revised in November 2020, which includes a commitment to deliver a 70% renewable energy target and has been delivered to the EU.

Submission WXF-C3-116 (Coillte). Ireland, under the programme for government, also committed to achieving a 7% reduction annually from 2021-2030, which was noted in the final NECP, and therefore goes above what the NECP commits to.

Submission WXF-C3-136 (IWEA). Commends the ambitious target of achieving 100% electricity generation in the county from renewables by 2026. The projections of an additional 100MW of onshore wind capacity by 2030 is noted, it is considered that the Wexford has the potential to increase this target.

Submission WXF-C3-144 (Terra Solar II). Expected that solar energy will play a significant role and this is reflected in the provisional results of the first RESS auction in July 2020. Concern expressed about the targets in the energy strategy, notably the 46MW for solar.

Existing Permissions for Solar PV

Submission WXF-C3-109 (3CEA). Updates for RESS auction, 11 solar projects were successful in Wexford in the first round. Note that there is no mention of Sustainable Energy Communities and the community opportunities for scale, not community level where there is less impact on the landscape.

Submission WXF-C3-167 (Eirgrid) to update planning permission figures.

RES-H

WXF-C3-109 (3CEA): (p28, 2nd paragraph) 'Facilitate the development of renewable heat technologies and promote energy efficient design'. Note that there is minimal detail of how this will be executed detailing the relevant department involved and that there is no mention of Sustainable Energy Communities

WXF-C3-168 (SSE): We welcome the priority that has been attached to energy efficiency in Wexford's draft CDP. We recommend that the CDP reflect Action 64 in the Climate Action Plan which seeks to increase energy efficiency of Local Authority social housing stock.

RES-T

Submissions WXF-C3-135 (ESB) and WXF-C3-168 (SSE) consider that promoting, encouraging and facilitating the use of sustainable modes and patterns of transport, including electric vehicles, with appropriate parking standards that will set minimum levels of parking provision for EV's will be critical to drive the electrification of transport. The CDP should go further than the current policies outlined to identify areas where EV charge points could be installed and competitively tender for these assets.

Section 3.3 Renewable Energy Targets Chief Executive's Response

Per submission WXF-C3-109 (3CEA), it is accepted that it is required to update the strategy to reflect the NECP 2021-2030. The submissions WXF-C3-77 (Harmony Solar), WXF-C3-116 (Coillte), WXF-C3-136 (IWEA) and WXF-C3-144 (Terra Solar II), note the respective roles of solar, on shore wind and off shore wind, and consider that there is room to increase those targets. It is considered that the existing targeted figures, cumulatively, are acceptable and consistent with meeting requirements. It is noted that there is the possibility of the targeted 46.5MW of solar being exceeded, but it is difficult to estimate when actual construction and connection to the grid will occur. Should Solar PV exceed the target, which would be welcome, this will position the County as being a leader in the country.

Existing Permission for Solar PV

Per Submission WXF-C3-167 (Eirgrid), it is recommended to update the planning permissions for Solar PV and connection offers from the first round of the RESS.

RES-H

The submission of 3CEA is noted. The Council is supportive of energy efficiency measures, including initiatives such as Sustainable Energy Communities. The execution or provisions of such details are outside the remit of planning but rather a Building Control issue to comply with the requirements of the Building Regulations.

The submission of SEE is noted. The Council is committed to increasing the energy efficiency of social housing stock.

Section 4.2.2 Methodology

Grid Infrastructure

Submission 77 (Harmony Solar), considers that the location of national grid should not be a constraint for siting of solar farms.

Submission WXF-C3-135 (ESB). By developing hybrid renewable plants, such as wind, solar and battery exporting from common points of connection, but at different times, the need for transmission infrastructure associated with new generation is minimised and grid stability can be improved on.

Designated sites

Submission WXF-C3-35 (Jim Hurley) expresses concern that 'Shellfish Areas' are not protecting our natural heritage and that aquaculture damages the environment.

Settlements

Submission WXF-C3-77 (Harmony Solar) considers it prudent that exemptions for direct connections to business and industry should be considered an exemption regarding the 1km exclusion zones around settlements. Submission WXF-C3-164 (OPR) requests the omission of exclusion around the settlements as indicated on map 5. Submission WXF-C3-95 (WEN) request that an objective with regard to community power generation in housing and industrial areas be included.

Section 4.2.2 Methodology Chief Executive's Response

Grid Infrastructure

The submission of WXF-C3-77 (Harmony Solar) notes that the location of the national grid should not be a constraint for siting of solar farms. The location of the grid is one of a number of factors in determining areas suitable for solar PV development. The strategy supports EirGrid in reinforcing existing grid infrastructure and strengthening the capacity of existing lines, or the principle of maximising the use of scarce public resources. The strategy does not preclude the development of new infrastructure as evidenced by the widespread area where solar PV development is open to consideration and is consistent with RPO96 but considers it prudent to maximise existing infrastructure. The energy strategy is supportive of the suggestion from submission of WXF-C3-135 (ESB) whereby renewable technologies such as wind, solar and battery exporting from common points of connection, but at different times, the need for transmission infrastructure associated with new generation is minimised and grid stability can be improved on. No change recommended.

Designated sites

It is considered that the potential for impact upon shellfish areas as noted by submission WXF-C3-35 (Jim Hurley) were adequately considered and that the energy strategy protects this important designation. No change recommended.

Settlements

The energy strategy considered the issue of appropriate and sustainable development within towns and villages. Whilst noting the submission WXF-C3-77 (Harmony Solar) and submission WXF-C3-164 (OPR) that solar farms should not be precluded within 1km of towns and villages, it remains the view of the Council that the large land areas associated with large solar farms would be an inefficient use of limited land supply.

It is noted that for small wind turbines that there are exemptions and it is considered reasonable that an objective be added for smaller PV development, similarly worded to existing Objective ES13, which would allow

“Facilitate, where appropriate, small scale wind energy development projects in urban areas, industrial estates, business parks and small community-based

proposals, subject to compliance with normal planning and environmental criteria and the development management standards contained in Section 5.7”.

Section 4.2.3 Other Constraints and Facilitators

Major Roads and Railways

Submission WXF-C3-34 (TII) considers it important that glint and glare assessments, amongst others, for solar farms, include robust mitigation where impacts upon strategic national road infrastructure are identified. The submission also expressed concerns about possibly compromising national road infrastructure if grid connection on national road is allowed.

Tourism and Recreation

Submission WXF-C3-77 (Harmony Solar). The Energy Strategy should recognise the potential for co-development where a solar farm is located in proximity to an established tourist attraction or popular outdoor recreation area having regard to site sensitivities and normal planning considerations.

Archaeology

Submission WXF-C3-77 (Harmony Solar) supports the view that an archaeologist should be engaged but requests that geophysical surveys be dealt with by way of condition as foundations for solar PV can be flexible and non-intrusive.

Section 4.2.3 Other Constraints and Facilitators Chief Executive’s Response

Major Roads and Railways

The submission WXF-C3-34 (TII) expressed concerns about the possibly concerns compromising national road infrastructure if grid connection on national road is allowed. The energy strategy already considered the potential for impact on roads, including national roads. This concern has been addressed within the transport chapter of Volume One. No change recommended.

Tourism and Recreation

As noted by submission WXF-C3-77 (Harmony Solar), subject to care being taken and that solar PV development do not negatively impact upon tourism and recreation areas, such proposals can be considered within designated areas. No change required.

Archaeology

As noted by submission WXF-C3-77 (Harmony Solar) which supports the view that an archaeologist should be engaged, it is considered that the approach to archaeological issues that may arise is best dealt with on a case by case basis. No change recommended.

Section 4.2.5 Development Management Standards for Solar Farms

Submission WXF-C3-77 (Harmony Solar) notes that it may not be possible to precisely define the generation capacity at planning application stage and that this should be addressed by condition.

Siting of New Developments

Submission WXF-C3-77 (Harmony Solar) requests that the siting of new developments is considered on a case by case basis, recognising that there is a necessity in some instances for large solar development to be fragmented on account of ecological considerations, access requirements, flood related concerns, land suitability, residential amenity considerations and land availability.

Glint and Glare

Submission WXF-C3-16 (Tony Dennison). Given that the various assessments for solar farm developments may not be 100% accurate, it would be prudent that the local authority make it a requirement in the Wexford County Council Development Plan 2021 to 2027 and it be set by condition, that after commissioning, if there is any problem with Glint & Glare or other assessments carried out that the developer has relied upon, then, it's the developer who shall be responsible for any and all costs for remedial works to rectify any problems.

A very close eye should be kept on the saturation of an area with granting of permissions.

As the technology is advancing rapidly in Solar PV Panels, it would be prudent that a requirement should be set by condition such that the final details of intended Solar PV Panels be approved by the planning authority, and that the proposed final choice of panels be accompanied by a revised glint and glare report for the intended Solar PV Panels.

Visual Impact Assessment

Submission WXF-C3-16 (Tony Dennison). Under Photomontages it should be made a necessity that photomontages must show year around views to include all seasons.

Landscaping

Submission WXF-C3-16 (Tony Dennison). Due to the increase saturation by Solar Farms in areas close to ESB sub-stations it should now be a requirement set by condition such that no Solar PV Panel or any other part of the development be placed within 100 metres of a residential dwelling, and that this 100 metres buffer zone shall be planted with native forest trees and shrubs, ensuring an adequate depth of vegetation to prevent any glint or glare or other impacts on residential amenity. Also, it should not be the case where residential dwellings are surrounded on both or indeed all sides by such developments as can be the case in areas just because they are near an ESB sub-station. Section 4.2.5

Biodiversity

Submissions WXF-C3-77 (Harmony Solar) and WXF-C3-135 (ESB) expresses concern that the DM standards require at least 15% of the solar farm area to be planted with native woodland species. This may result in overshadowing of solar panels and reducing the area available for solar panels, thus potentially negatively impacting on the delivery of solar developments.

Flood Management

Submission WXF-C3-77 (Harmony Solar) seek to ensure that the Council acknowledges that solar panels are 100% water compatibly and their provision in a flood zone should not be precluded. This should nonetheless, be assessed on a site specific basis involving the preparation of site specific flood risk assessment as part of any future solar PV development.

Community Consultation

Submission WXF-C3-16 (Tony Dennison). Attach a condition to all solar and wind farm projects to be worded as thus: "Prior to connection to the national grid, a community liaison committee shall be established to liaise between the developer and the local community. The membership of this committee shall reflect membership of the local community, shall include members of the Council and the developer. Details of the committee shall be agreed between the planning authority and the developer prior to commencement of development. The community liaison committee shall have the responsibility for the administration of any community benefit fund account and for decision on projects to be supported by the fund in addition to acting as a liaison committee with the local community in relation to ongoing monitoring of the operation of the proposed development".

Timescale

Submissions WXF-C3-77 (Harmony Solar) and WXF-C3-135 (ESB): Longer permission should be considered. It can take many years to get a grid connection after planning permission. Solar developments now have a minimum lifespan of 30 years and investment decision are made over 40 years, requests that permissions are to 40 years from the present 25.

Decommissioning

Submission WXF-C3-77 (Harmony Solar): It is considered that a condition of planning should be attached to any future schemes which state the following: "A decommissioning plan will be agreed with the local authority three months prior to decommissioning the proposed development".

Environmental Impact Assessment

Submission WXF-C3-77 (Harmony Solar): The development plan should recognise the High Court precedent and the fact that EIA cannot be requested for solar development in Ireland.

Section 4.2.5 Development Management Standards for Solar Farms Chief Executive's Response

It is considered that a reasonable estimate of generation capacity can be outlined at planning application stage, as demonstrated by the fact that the vast majority of planning

applications for solar PV developments detailed such. It is therefore not recommended to accept the request of submission WXF-C3-77 (Harmony Solar).

Siting of New Developments

The submission WXF-C3-77 (Harmony Solar) notes concerns that in cases that an application for solar PV development may be over a fragmented landholding and such a planning application should be facilitated. It is considered reasonable that where such a planning application presents, that details as appropriate be provided demonstrating why such an approach was required and that a more compact form was not considered feasible. No change recommended.

Glint and Glare

The submission WXF-C3-16 (Tony Dennison) notes concerns regarding glint and glare surveys, that an area may become saturated with solar PV developments and that any additional remedial work where issues arise should be addressed by the developer. It is considered that the energy strategy adequately addresses these issues. The energy strategy sets the requirements for surveys to be submitted and the development is required to be carried out by the developer in accordance with the submitted details once planning permission is obtained. Where issues arise, such would be pursued as appropriate through the planning enforcement process. No change recommended.

Visual Impact Assessment

The submission WXF-C3-16 (Tony Dennison) notes that photomontages should detail year around views to include all seasons and that cumulative impacts of permitted solar PV developments is considered. It is already the case that cumulative visual impacts of solar PV developments are to be assessed. It is recommended that a minor change to wording in the text is appropriate to adequately address seasonal views to be included within photomontages.

Landscaping

The proposal that a 100-metre buffer zone from neighbouring residential development should be a standard and that this buffer zone be planted by native planting per submission

WXF-C3-16 (Tony Dennison) is noted. It is considered that the requirement for a visual impact assessment, which would consider potential impact on residential amenity is sufficient to afford adequate protection for neighbouring dwellings. It is already the case that the energy strategy requires details through siting of PV arrays, landscape screening requirements and the requirement for an area to be set aside for native planting, to ensure visual impacts are minimal, including upon neighbouring dwellings. No change recommended.

Biodiversity

The concerns regarding a requirement for 15% set aside area for native planting as expressed by submissions WXF-C3-77 (Harmony Solar) and WXF-C3-135 (ESB) are noted. It is considered appropriate to support biodiversity and in this instance to seek new native woodlands areas. The 15% proposal is intended as a set aside area to boost biodiversity which will also soften the visual appearance from new and large areas of solar farm arrays. This requirement is considered reasonable and no change is recommended.

Flood Management

The energy strategy supports the view that flood risk assessment is most suitably assessed on a site specific basis involving the preparation of site specific flood risk assessment for solar PV development as noted by submission WXF-C3-77 (Harmony Solar). No change recommended.

Community Consultation

The suggestion of submission WXF-C3-16 (Tony Dennison) that a community fund for renewable energy projects and distribution of funds should be agreed as part of a planning condition, to include Council and community participation of an appropriate committee to oversee such funds. It is considered that the energy strategy has sufficiently considered the very important role of community consultation, including planning gain for a community. No change recommended.

Timescale

The issue of timescale as noted by submissions WXF-C3-77 (Harmony Solar) and WXF-C3-135 (ESB) are noted. It is acknowledged that there can be a significant timespan before a permitted development has the necessary additional permissions to start construction. It is also acknowledged that technology has advanced and will continue to advance. It is therefore recommended that the permission length of 25 years be changed to start from the date of commencement of development, which is notified directly to the Council as a commencement notice. It is not recommended to change the permission from 5 years and the Extension of Duration option remains open, if required.

Decommissioning

As noted by submission WXF-C3-77 (Harmony Solar), it is considered appropriate that a condition of planning should be attached to any future schemes which state the following: “A decommissioning plan will be agreed with the local authority three months prior to decommissioning the proposed development”. It is already the case that a decommissioning plan is required. It is considered appropriate that a definitive time scale be set in the interest of clarity and a minor change to the text is required.

Environmental Impact Assessment

As noted by submission WXF-C3-77 (Harmony Solar), the Council is aware of the High Court decision regarding EIA. Solar PV developments will continue to be screened for EIA implications in the same manner as for other developments. No change recommended.

Section 5.3 Wind Energy Methodology

Introduction

Submission WXF-C3-135 (ESB): Suggests that there be greater consistency between wind areas on county borders so that a project on both sides of a border would be viable, as if just confined to one county, may not be viable to compete in future RESS auctions.

Submission WXF-C3-168 (SSE): We recommend the methodology used in the draft Renewable Energy Strategy be considered with Ireland’s national targets in mind to ensure a sufficient quantum of land is designated for wind energy developments.

Wind Resource

Submissions WXF-C3-116 (Coillte), WXF-C3-136 (IWEA) and WXF-C3-168 (SSE): The SEAI wind atlas or any similar general wind resource data should not be used as a constraint. Wind technology has advanced significantly and site specific wind measurement are more accurate.

Transmission Network

Submissions WXF-C3-116 (Coillte), WXF-C3-136 (IWEA) and WXF-C3-168 (SSE): Recommend that grid constraints not be considered a hard restraint, as the grid will react to planning consent or critical mass of planning consented as necessary. Also appropriate to use existing grid capacity and where investment has been made. Southern Regional RSES RPO96 should be mirrored in the draft strategy.

Designated Sites

Submission WXF-C3-136 (IWEA). Designated sites should not be excluded as unsuitable for wind power generation by assessed on a case by case basis. Given the decarbonisation and renewable energy ambitions, wind energy development will have to extend from the least sensitive landscapes with the most capacity into areas of slightly more sensitive landscapes.

Residential Areas

Submission WXF-C3-94 (OPR) notes that that there is a section in the text which states “Similarly, turbines shall not be permitted within 250metres of the boundary of an adjacent landholding, unless the written consent of the owner is given” and this would be inconsistent with Section 28 guidelines. The submission further notes that this is not stated in the objectives of development standards for wind development and therefore may be erroneous.

Tourism and Recreation

Submission WXF-C3-136 (IWEA). On what basis was mountain moorland classified as no longer suitable?

Section 5.3 Wind Energy Methodology Chief Executive's Response

Introduction

The submissions of WXF-C3-135 (ESB) and WXF-C3-168 (SSE) are noted. The strategies and designated wind areas of adjoining counties and their designated areas were considered within the energy strategy. The energy strategy also considered that adequate land be designated to meet requisite targets for on shore wind development. The Council is supportive of a regional co-ordinated approach. No change recommended.

Wind Resource

The submissions of WXF-C3-116 (Coillte), WXF-C3-136 (IWEA) and WXF-C3-168 (SSE) regarding the use of the wind atlas area noted. The SEAI wind atlas was one of a number of considerations that were mapped and overlaid on GIS in aiding to determine the most suitable wind area. No change recommended.

Transmission Network

The submissions of WXF-C3-116 (Coillte), WXF-C3-136 (IWEA) and WXF-C3-168 (SSE) regarding the location of the transmission network are noted. The transmission network was one of a number of considerations that were mapped and overlaid on GIS in aiding to determine the most suitable wind area. No change recommended.

Designated Sites

While noting the submission WXF-C3-136 (IWEA), it is considered reasonable to afford protection to designated sites as exists.

Residential Areas

As queried by Submission WXF-C3-164 (OPR), the reference in the text to 250 metres requiring the permission of a neighbouring landowner is considered reasonable. Having regard to the impact wind turbines can have on land uses (including agricultural uses and workplaces) within their immediate vicinity it is considered that the requirement to have the permission of a landowner within 250 metres of their boundary from a wind turbine is reasonable and should remain. It is recommended that this policy is restated in Section 5.7, Development Management Standards.

Tourism and Recreation

As queried by Submission WXF-C3-136 (IWEA), it is considered reasonable to afford protection for mountain moorlands for recreation and visual amenity issues primarily. No change recommended.

Section 5.7 Wind Farm Development Management Standards

Duration of Permission

Submission WXF-C3-168 (SSE): New consents need to allow for 30-35 years operation at a minimum so as not to unnecessarily limit the operation of the development and ensure developers are able to build a strong business case at the outset.

Siting, Layout and Design

Submissions WXF-C3-116 (Coillte), WXF-C3-136 (IWEA) and WXF-C3-168 (SSE): Requests that the current or draft 2019 wind farm development management standards be omitted as these could be subject to change, and refer to the national standard instead.

Replacement, repowering and redevelopment

Submission WXF-C3-168 (SSE): We would also encourage WCC to recognise the importance of ensuring the continued use, reuse or repowering of existing infrastructure where appropriate to allow Ireland to enable Ireland to meet its energy needs.

Section 5.7 Wind Farm Development Management Standards Chief Executive's Response

Duration of Permission

The issue of duration or permission as noted by submission WXF-C3-168 (SSE) is noted. It is acknowledged that there can be a significant timespan before a permitted development has the necessary additional permissions to start construction. It is also acknowledged that technology has advanced and will continue to advance. It is therefore recommended that the permission length of 25 years be changed to start from the date of commencement of development, which is notified directly to the Council as a commencement notice. It is not recommended to change the permission from 5 years and the Extension of Duration option remains open, if required.

Siting, Layout and Design

The submissions WXF-C3-116 (Coillte), WXF-C3-136 (IWEA) and WXF-C3-168 (SSE) are noted. It is acknowledged that the national wind farm development standards are a draft. The Council has considerable experience with wind farm developments and it is considered appropriate to highlight some of the main standards within the energy strategy. It is already acknowledged that should there be changes to the final and adopted version, that regard will be had to those standards. No change recommended.

Replacement, repowering and redevelopment

As highlighted by submission WXF-C3-168 (SSE), the energy strategy is supportive of the appropriate replacement, repowering and redevelopment of established wind farm developments. No change recommended.

Decommissioning

Per the duration of permission section above, amend the text.

Section 7.1.3 Off-shore wind farms

Submission WXF-C3-168 (SSE) recommend that Wexford's CDP recognises the potential opportunities for the county with regard to offshore wind and ensure policies and approaches taken onshore are consistent with enabling the delivery of 5GW offshore wind by 2030.

Submission WXF-C3-143 (An Taisce) recommends that that the CDP include a policy requiring the use of a seabird sensitivity map in the early stages of planning, to assess the risk posed by marine renewable energy developments, and to fully comply with legal obligations to protect birds and their habitats. The submission notes that the development of a sustainable and effective offshore energy regime for Ireland is a major strategic priority for the decade ahead. Wind energy installation has been decreasing in costs, and the technology for the deployment of floating turbines is now in place, radically increasing the marine area open to consideration for use.

Section 7.1.3 Off-shore wind farms Chief Executive's Response

As highlighted by submission WXF-C3-168 (SSE), the energy strategy has considered and factored in the Arklow Bank Phase II project. No change recommended.

It is considered appropriate that the use of seabird sensitivity mapping be required to fully assess potential risks posed by marine renewable energy developments as noted by submission WXF-C3-143 (An Taisce).

Section 7.3 Geothermal Energy

Submission WXF-C3-10 (GSI). Ireland has widespread shallow geothermal resources for small and medium - scale heating applications, which can be explored online through Geological Survey Ireland's Geothermal Suitability maps for both domestic and commercial use. We recommend use of our Geothermal Suitability maps to determine the most suitable type of ground source heat collector for use with heat pump technologies.

Ireland also has recognised potential for 'deep' (>400m) geothermal resources. Geological Survey Ireland currently supports and funds research into this national energy resource. We are currently completing a roadmap for geothermal energy use in Ireland which we expect to publish in 2020.

Section 7.3 Geothermal Energy Chief Executive's Response

The submission WXF-C3-10 (GSI) provides additional information with regard to geothermal suitability. It is considered appropriate to detail such and it is recommended to make additions to the text.

Section 8.1 Introduction

Submission WXF-C3-168 (SSE) notes that there are opportunities for shared CCS (carbon capture storage) and hydrogen to decarbonise conventional generation, industry and transport which should also be supported.

Section 8.1 Introduction Chief Executive's Response

The submission WXF-C3-168 (SSE) is noted. The energy strategy is supportive of proposals to decarbonise. No change recommended.

Section 8.2 The National Grid

Submission WXF-C3-135 (ESB). Ensuring that the long-term operational requirements of existing utilities are protected. The importance of existing infrastructure and the associated power generation, transmission and distribution operations are strategic and national in nature. The final plan should maintain planning policies which protect the county's future capacity for the development of energy infrastructure whilst encouraging the sustainable development of renewable energy sources, including energy storage systems.

Submission WXF-C3-167 (Eirgrid). The Climate Action Plan...The Council will therefore support such development, subject to normal planning and environmental criteria, including impacts on residential and visual amenity. Requests removal of final line as elevates over other planning criteria.

Objective in relation to the national grid reiterates Objective PT01, suggests to replace with relevant regional policy objectives.

Section 8.2 The National Grid Chief Executive's Response

The submission WXF-C3-135 (ESB) is noted. The energy strategy is supportive of protecting and maximising the use of existing infrastructure, whilst encouraging the sustainable development of renewable energy sources, including energy storage systems. No change recommended.

The submission WXF-C3-167 (Eirgrid) is noted. It is considered reasonable when assessing planning application that residential and visual amenity issues are considered and that the existing objectives are reasonable. No change recommended.

Section 8.4 Energy Storage

Submission WXF-C3-134 (Irish Water) Welcomes the battery storage objectives and would welcome inclusion of specific policies to support in other storage systems such as liquid air storage and synchronous condensers.

Section 8.4 Energy Storage Chief Executive's Response

Per submission WXF-C3-134 (Irish Water), it is noted that there are other energy storage technologies, as well as battery storage. It is recommended to add additional text highlighting such alternatives.

Chief Executive's Recommendations

It is recommended that the following proposed amendments be made to Volume 10 Energy Strategy.

CE V10.1

Amend bullet point one of the strategic aims on page 5:

To support the attainment of national renewable energy and carbon reduction targets and to position the County as a leader in renewable energy generation and energy efficiency.

CE V10.2

Amend the text on page 8:

~~Draft National Energy and Climate Plan 2021-2030 (Government of Ireland, December 2018 Department of Communications, Climate Action and Environment)~~

The ~~draft~~ National Energy and Climate Plan 2021-2030 (NECP) uses modelling to forecast Ireland's overall renewable energy share of gross final energy consumption across the electricity, heat and transport sectors for 2020 and 2030 (and 2040). The ~~Draft~~ Plan sets out ~~four~~ two different scenarios using ~~existing (baseline) measures and additional measures, as well as high and a baselines (With Existing Measures) and an advanced polices and measures scenario (With Additional Measures) with low oil prices as variants.~~ The current energy efficiency reporting under the NEEAP (which requires a report to be submitted to EU every three years) will be subsumed into the NECP 2021-2030.

CE V10.3

Omit reference to the National Mitigation Plan, struck out by a high court decision, page 11/12.

~~National Mitigation Plan (Department of Communications, Climate Action and Environment, July 2017)~~

~~The National Mitigation Plan (NMP) lays the foundations for transitioning Ireland to a low carbon, climate resilient and environmentally sustainable economy by 2050. The NMP, which will be revised every 5 years, focuses on climate action and emissions reduction and outlines policies and measures in place and under consideration to reach national climate goals. This is a cross-government Plan, reflecting the roles of key Ministers responsible for the sectors covered by the Plan—Electricity Generation, the Built Environment, Transport and Agriculture, as well as drawing on the perspectives and responsibilities of a range of other Government Departments.~~

CE V10.4

Amend the text on page 23, first paragraph:

The revised Renewables Directive establishes a binding renewable energy target for the EU for 2030 of at least 32% with a clause for a possible upwards revision by 2023. EU countries are required to draft 10-year National Energy and Climate Plans (NECPs) for 2021-2030 outlining how they will meet the new 2030 targets for renewable energy and for energy efficiency. Ireland has submitted ~~a Draft~~ the NECP 2021-2030 which sets out ~~four~~ two scenarios for renewable energy ~~and energy efficiency~~ up to 2030 based on low/~~high~~ oil prices ~~and government energy measures to be implemented~~ with existing measures and with additional measures. Table No. 4 below gives an overview of the ~~four~~ two different scenarios.

CE V10.5

Amend Table 4 Overview of the Draft NECP to 2 scenarios, page 23:

	NECP1 with existing measures (WEM)(Low Oil Price)	NECP2 with additional measures (WEM)(Low Oil Price)
RES-E%	55	70
RES-H%	14	24
RES-T%	17.7	33.5
Overall RES%	21.5	34.1

CE V10.6

Amend the text on page 23 last paragraph, page 24 first paragraph:

For scenario 1, the existing energy measures are maintained up to 2030. With scenario 2, additional measures are implemented, which lead in 2030 to less fossil fuel and more renewable energy compared to scenario 1. ~~Scenarios 3 and 4 are respectively the same as scenarios 1 and 2 for low oil prices.~~

The energy balance for County Wexford has been developed based on Scenario 2, ~~as an increase in oil price is expected in the future~~ and this is considered the most likely of the ~~four~~ two scenarios to meet national and EU policy and targets for renewable energy. Based on this scenario, renewable energy installed capacity and energy production for additional energy measures and ~~high~~ low oil prices were analysed up to 2030. Installed capacity in 2017 and future projects installation up to 2030 in County Wexford are outlined in Table No. 5. Table No. 6 shows the renewable energy generated in County Wexford in 2017 and the projection up to 2030. The last column shows the renewable energy production limited to ~~53.8~~ 70% RES-E in 2030 at county scale. Based on this analysis, the generation of renewable energy will increase by 84% up to 2030.

CE V10.6

Amend last column of Table 5 to reflect 70% RES-E rather than ~~53.8%~~, page 24.

CE V10.7

Amend last bullet point, page 25

- ~~55~~70% RES-E achieved in 2030 and maintained

CE V10.8

Amend last column of Table 6 to reflect 70% RES-E rather than 53.8% , page 25

CE V10.9

Amend the text on page 26, first paragraph:

Table No. 1 above shows that energy consumption for electricity in County Wexford is projected to be 1,775 GWh in 2030. Based on the above analysis, the projected installed renewable energy capacities and renewable energy production will account for 68.4% of the projected energy consumption for electricity in County Wexford in 2030. However, if all the existing permissions for solar PV developments (475 MW as at ~~May~~ December 2020) are installed, then this would account for 95.2% of the projected energy consumption for electricity in County Wexford in 2030. An additional 102 MW of solar energy or 27 MW of onshore wind energy would provide 100% of the projected energy consumption in 2030, thus transitioning the County to a low carbon economy.

CE V10.10

Amend the text on page 26, second paragraph:

It is also noted that there are existing connection offers from the first round of the RESS auction and ~~ECP-1 offers for 24~~ 11 solar farms with a stated installed capacity of ~~266~~ 186 MW, however, given the unpredictability as to whether or when such connections would materialise, it was considered that such figures should not be used for renewable energy production estimates.

CE V10.11

Amend that text on page 30, second paragraph:

As of ~~March~~ December 2020, planning permission has been granted for 36 solar farms in County Wexford with a combined anticipated output of 475 MW and covering an area of 885.45 hectares. Map 1 shows the location and status of solar farm applications in County Wexford.

CE V10.12

Amend that text, page 39, bullet point three:

- Photomontages should be included from each viewpoint showing the proposed development with and without any proposed screen planting and detail differing views during different seasons of the year as appropriate.

CE V10.13

Amend the text, page 45, paragraph 2:

Where applications are approved for a temporary solar PV development, planning consent will be limited by condition to that temporary period. Planning permission shall be limited to a period of five years, unless granted by an extension of duration under Section 42 of the Planning and Development Act 2000 (as amended). The lifetime of the development shall also be restricted to a maximum of 25 years, to start from the date as detailed in the commencement notice for construction works to commence in accordance with Building Regulations requirements, due to the temporary nature of the development and the potential deterioration of the infrastructure.

CE V10.14

Amend the text, page 45, paragraph 3:

Where planning permission is granted for a solar PV development, a Decommissioning Management Plan will be agreed with the local authority three months prior to decommissioning ~~will be required prior to decommissioning of the development.~~ The Plan should include details for the restoration of the site, releveling to original contours and continued agricultural use.

CE V10.15

Insert new objective, page 48:

Facilitate, where appropriate, small scale solar energy development projects in urban areas, industrial estates, business parks and small community-based proposals, subject to compliance with normal planning and environmental criteria and the development management standards contained in Section 4.2.5.

CE V10.16

Amend the text, page 73, second paragraph:

~~The Planning Authority may grant permission for a duration longer than five years in certain circumstances, for example, to ensure that the permission does not expire before a grid connection is granted. It is, however, the responsibility of the applicants in the first instance to request such longer durations in appropriate circumstances.~~

Where applications are approved for a temporary wind farm development, planning consent will be limited by condition to that temporary period. Planning permission shall be limited to a period of five years, unless granted by an extension of duration under Section 42 of the Planning and Development Act 2000 (as amended). The lifetime of the development shall also be restricted to a maximum of 25 years, to start from the date as detailed in the commencement notice for construction works to commence in accordance with Building Regulations requirements, due to the temporary nature of the development and the potential deterioration of the infrastructure.

CE V10.17

Insert additional bullet point, page 74, first paragraph:

Turbines shall not be permitted within 250 metres of the boundary of an adjacent landholding, unless the written consent of the owner is given

CE V10.18

Amend the text, page 88, bullet point 3:

- The wind energy development shall ~~generally~~ be decommissioned and removed ~~30~~ 25 years after the date of ~~commissioning~~ commencement of development of the wind energy development unless, prior to the end of this period, planning

permission has been granted for the continuation of the use of the land as a wind energy development for a further period in accordance with prevailing legislation.

CE V10.19

Insert additional text at end of third paragraph, page 107:

Seabird Sensitivity mapping shall be used as part of the preparation and assessment of marine energy developments.

CE V10.20

Amend that text, page 113, paragraph 1:

Geothermal energy refers to heat energy stored in the ground. Solar thermal radiation is absorbed by the surface of the earth each day. This heat can be extracted using a ground source heat pump which transfers the heat stored in the earth or in ground water to buildings in winter and the opposite in summer for cooling. Geothermal energy may be classified as either 'deep' or 'shallow' depending on the depths involved. Ireland has widespread shallow geothermal resources for small and medium - scale heating applications, which can be explored online through Geological Survey Ireland's Geothermal Suitability maps for both domestic and commercial use. Ireland also has recognised potential for 'deep' (>400m) geothermal resources. Geological Survey Ireland currently supports and funds research into this national energy resource. ~~Deep geothermal typically involves drilling in excess of 400m below the earth's surface. The NREAP does not envisage electricity from deep geothermal sources contributing to the national 2020 targets. The focus is therefore on shallow geothermal energy.~~

CE V10.21

Add additional text at the end of paragraph 1, page 118:

Recent advances in Battery Energy Storage (BES) mean that output from renewable energy developments can be maximised. Batteries can store energy from intermittent energy sources (e.g. sun and wind) and release it when it is more needed, thus increasing the renewables contribution to the energy mix. It also helps to maintain grid stability and flexibility by providing a more constant supply. BES systems allow the owners of solar PV or wind generators to store the energy produced – when it is inexpensive and when it would

be uneconomic to supply it to the grid – and then to release it when prices are higher. Similarly, batteries can store the energy produced with renewables that would otherwise have been curtailed (e.g. when wind turbines are shut down due to high wind speeds). This increases the contribution of renewables to the energy mix and also maintains grid stability. There are additional energy storage technologies such as liquid air storage and synchronous condensers that can also play a role in grid stability.

CE V10.22

Add additional text to the Objective, page 119, second paragraph:

To facilitate the development of Battery Energy Storage Systems and other energy storage technologies such as air storage and synchronous condensers at appropriate locations to ensure a reliable and secure energy supply, subject to normal planning and environmental criteria, including residential and visual impacts.