

Heather Cooke

From: Denis Devane [REDACTED]
Sent: 23 January 2019 15:58
To: RSES
Cc: David Connolly; [REDACTED]
Subject: IWEA Submission on Eastern and Midland Regional Assembly (EMRA) Draft Regional Spatial and Economic Strategies (RSES) Consultation
Attachments: IWEA Response to the EMRA RSES Jan 2019.pdf
Follow Up Flag: Follow up
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To Whom it May Concern,

Please find attached IWEA's submission to the Public Consultation on Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region.

Best, Denis

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22nd January 2019

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Submitted by email to: rses@emra.ie

**Re: Eastern and Midland Regional Assembly (EMRA)
Draft Regional Spatial and Economic Strategies (RSES) Consultation**

To whom it may concern,

The Irish Wind Energy Association welcomes the opportunity to make a submission in respect of the Draft Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategies (RSES) consultation. This submission follows on from IWEA's previous submission on the RSES submitted at the pre-draft stage, in February 2018.

IWEA is the leading renewable energy representative body in Ireland and as such has an active interest in the potential and development of renewable energy in Ireland, particularly wind energy. Approximately 120 organisations are members of IWEA across all areas of the wind industry including community engagement, planning, grid development, market design, health & safety, and asset management. IWEA works in a proactive and engaging manner with all stakeholders and as such feels it is both appropriate and important to make this submission, which is attached to this cover letter.

IWEA's wind development forecast indicates that Ireland is likely to fall short of the 2020 RESE target of 40%, while at the same time IWEA's members have more than sufficient projects in place to meet and even exceed this target. The response attached outlines some important considerations in relation to the formulation and implementation of RSES.

IWEA sees the RSES as an important first step in the transition away from the Local-Authority devised renewable energy plans and policies, towards a more standardised, regional approach with an overarching set of policies and a single plan across the 13 Local Authorities of the Region, which is better capable of translating the requirements of national policy for the benefit of individual projects.

IWEA welcomes the fact the Draft RSES sets out that the transition to a low carbon economy is one of the key challenges for the region. Of the five primary areas of transition at the core of the Strategy, the “Renewable Energy” area of transition is most relevant and of interest to IWEA’s aims and objectives.

IWEA also welcomes the Draft Strategy’s inclusion amongst the 16 Regional Strategic Outcomes the outcome to “support the transition to low carbon and clean energy” and the objective to “... harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050”. In the near 12 months since IWEA made its submission to the pre-draft RSES, and even the few months since the Draft Strategy was published, the scale of the climate change challenge faced by our nation is looming ever larger. The impacts of climate change are visible around the world via extreme weather events on a daily basis. In light of this ever-growing challenge, IWEA has some concerns that the multiple references in the Draft Strategy to “*supporting the transition to a low carbon economy by 2050*” will give the false impression that action to combat climate change can be delayed. It cannot.

The significance of the region’s resource potential for renewable energy is acknowledged in Table 3.1 of the Draft Strategy. Although very comprehensive, if the Draft Strategy is lacking in any area, it is in the specifics of how this resource’s potential is going to be harnessed, to ensure the potential of that resource can be maximised. It is acknowledged that sufficient time may not have been available prior to publishing the Draft RSES to clarify how the EMRA would engage with or be guided by relevant Government Departments, take into account the pending Renewable Electricity Policy and Development Framework, and other EU clean-energy targets. In the meantime, and in the coming period before the final RSES is published, further interaction with these other stakeholders to provide a clear policy roadmap for renewables, would be very welcome, and demonstrate where the RSES sits in the overall policy framework.

The County-level approach to the identification of areas with wind farm potential, has been recently, and is likely to continue to be undermined to the detriment of the necessary energy transition. Anti-wind objection groups that have formed to object to specific proposed wind farm projects, have regularly turned to the County Development Plan review process to undermine policy support for wind farm development in a county. Such groups have often called for county-wide bans on wind energy developments, which suits their aims, but does nothing to further the transition to a low carbon economy and decarbonise the electricity sector. The Local Authority’s development plan preparation process will find it immensely difficult to translate Government Policy in renewable energy into measures that can truly match the scale of the climate challenge we face as a nation. Across 31 Local Authorities nationwide, or the 12 in the Eastern and Midlands region, how much each Local Authority area has to contribute to the energy transition to a low-carbon economy should be determined on a regional basis by firstly determining what the region as a whole must contribute. Where and how the renewable energy potential of a Region is to be best-harnessed, must be determined on a regional basis, and not county by county.

The Draft Strategy correctly identifies as a guiding principle in the consideration of development on peatland areas, the “*consideration of the potential contribution of peatlands to climate change mitigations and adaptation including renewable energy production*”. There

are extensive areas of peatland across the region covered by the Draft Strategy, and they have a vital part to play in the energy transition to a low-carbon economy, by themselves in transitioning from one form of energy production (peat extraction) to another (renewable energy production), or by acting as carbon sinks and carbon stores.

IWEA is pleased to see included in the Draft RSES, recognition that *“it is necessary to establish a consistency of approach by planning authorities, both in identifying areas suitable for renewable energy developments and having regard to potential impacts”*.

The Regional Policy Objections on decarbonising electricity generation, and RPO 7.34 and RPO 7.35 are particularly welcome as they reflect the original suggestion of IWEA made in our pre-draft submission.

Given the scale of the climate change challenge ahead, and the economic opportunity that wind energy presents for the Eastern and Midlands Region, IWEA believes in relation to RPO 7.34, the ERMA should lead the identification of suitable areas for larger renewable generating projects, to ensure a consistent approach is used throughout the region and the potential of the entire region is identified in a single exercise that aligns with the energy transition targets that must be delivered across the entire state. Unless this responsibility to lead this process is specifically assigned to the ERMA, IWEA would be concerned it might be Local Authority-dependant, could become disjointed and may not be progressed in the timeframe required.

Section 10.3 of the Draft Strategy entitled “Energy” very clearly and succinctly identify how we need to better leverage our natural resources to increase our share of renewable energy and meet our energy targets.

The draft Strategy also rightly highlights the importance of developing the grid in the Region will enable the transmission system to safely accommodate more diverse power flows from renewable generation and also to facilitate future growth in electricity demand, strengthen the grid for all electricity users, and in doing so will improve the security and quality of supply to ensure the Region is to attract high technology industries that depend on a reliable, high quality, electricity supply. The continued reinforcement of the electricity transmission grid is going to be critical to ensure the full renewable energy potential of the Region can be harnessed, and IWEA strongly endorses the Regional Policy Objectives RPO 10.14 – RPO 10.19.

IWEA again appreciated the opportunity to contribute as the RSES for the EMRA is further developed and finalised. We look forward to seeing the updated plan documents in due course. Please don't hesitate to contact me if you need any further information.

Yours Sincerely,



Dr David Connolly

CEO

Irish Wind Energy Association

