



Waterford County Council

GreenSource submission to Review of

**Draft Waterford County Development Plan – August
2021**



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1 INTRODUCTION

Waterford County Council issued a Public Consultation Issues Paper on 18th June 2020 aimed at stimulating discussion on the development of the Waterford County Development Plan 2022 – 2028. The Chief Executive’s Report on the Pre-Draft Consultation Stage was published in October 2020. The pre-draft Waterford County Development Plan 2022-2028 was agreed to be the Draft Waterford County Development Plan 2022 – 2028. The public consultation phase relating to this Draft Waterford County Development Plan is now underway. The plan is an important blueprint for the development of Waterford from a physical, economic, social, and environmental viewpoint. The process includes a review of the existing County Development Plan and setting out the overall strategy for the sustainable development of Waterford for the period up to 2028. The development plan review process has a series of steps, and this submission is framed on the Draft Waterford County Development Plan 2022 - 2028.

2 GREENSOURCE ENERGY – COMPANY BACKGROUND

Greensource is a wholly owned Irish renewable energy company based in Adare, County Limerick. The company has grown and diversified over the last twenty years, having significant expertise in the planning, construction and operation of renewable energy projects in Ireland and abroad. Since inception, the company has played a key role in the development of over 150 MW of renewable energy projects in Ireland, playing a significant role in further decarbonising the electricity market in this country.

Greensource has developed a fleet of renewable energy projects including wind and biogas, involving one of the first, state of the art farm scale anaerobic digestion plants in Ireland, which has been operational since 2010. The GreenGas Anaerobic Digestion Plant developed in Shanagolden, County Limerick processes manure and slurry as well as other imported feedstock to convert these materials into energy, adding 1MW of renewable electricity generation in Limerick. This plant is one of two AD installations operational in Limerick, the second based on the conversion of biogas generated from wastewater treatment into electricity. The GreenGas plant would not have been developed without the close co-operation of the local authority officials and provided a roadmap for the development of farm scale anaerobic digestion plants in Ireland.

Greensource believes a major focus is required on the benefit to communities in the vicinity of renewable energy projects. Greensource has a strong affiliation to community benefit from the projects developed, with neighbouring communities having benefitted by in excess of €100,000 to date from these projects. The involvement of local communities and the development of community renewable energy projects will be key in ensuring renewable electricity targets are achieved. The development of small scale (<5MW) community renewable energy projects in Waterford, on both private and commercial lands will provide educational, economic and employment opportunities in local communities. The benefits of such an approach are already evident in counties Mayo and Tipperary where wind farm projects involving direct community investment in partnership with a private development company have been developed. Greensource provided a small advisory role in

the development phase of the Templederry Community Windfarm in Tipperary and are therefore cognisant of the challenges and opportunities present for community renewable energy projects.

3 WATERFORD COUNTY DEVELOPMENT PLAN REVIEW PROCESS

The review of the Waterford County Development Plan commenced in July 2020 with the issuing of the Public Consultation Issues Paper as part of the Pre-Draft Public Consultation Phase. This first stage in the process had a focus on seeking engagement on objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the county. The county council was seeking submissions/observations that were strategic in nature and focused on 'big picture' issues.

The Public Consultation Issues Paper identified a number of key themes for consideration, as follows:

- Population and Settlement Hierarchy
- Economy, Employment, Education
- Rural Economic Development
- Sustainable Tourism
- Transport and Mobility
- Principal Enabling Infrastructure, Energy and Communications
- Climate Change and Environment
- Heritage and Culture
- Sustainable Communities and Place Making

The ongoing development of renewable energy and green infrastructure touches on all themes outlined above.

The pre-draft Waterford County Development Plan 2022 - 2028 was agreed to be the draft Waterford County Development Plan 2022 – 2028. This has led to the issuing of the draft plan.

The following are some of the key issues which have been considered in the draft development plan in terms of Energy.

- Sustainable development and communities
- Policies and objectives that tackle the onset of climate change
- Sustaining business and economy, while protecting or enhancing our environment
- Security of supply in terms of Energy
- Sustaining rural Ireland population and providing local employment
- Zoning of sufficient lands to facilitate the ongoing delivery of wind energy projects

It is noted that climate mitigation and adaptation policies and objectives are included in each chapter of the draft plan, thereby demonstrating the recognition of Waterford County Council towards the need to transition to a low carbon and climate resilient county.

Chapter 6 of the draft plan relates to Utilities Infrastructure, Energy and Communication. The strategic aim of this chapter is outlined below.

“To promote and facilitate the provision of energy efficient, low carbon infrastructure and utilities and support infrastructure, whilst supporting industry to innovate, decarbonising the energy sector in order to contribute to a national target of no net emissions of greenhouse gases in Ireland by 2050”

This aim clearly identifies the potential opportunity available in Waterford to become a national leader in the development and roll-out of renewable energy generation systems, thereby transitioning to a low carbon and climate resilient county.

Greensource is fully supportive of the development of renewable energy projects in the county.

4 POLICY AND LEGISLATION

4.1 INTERNATIONAL

Agenda 2030 Sustainable Development Goals and The Paris Agreement on climate change require a transformational shift of our economies and societies towards climate resilient and sustainable development. In light of the issues of energy security and possible future resource constraints and the issue of global warming, the renewable energy sector looks set to play a bigger role in the economic and infrastructural future of our country.

4.2 EUROPEAN

The Irish Government supports the ambition within the European Union (The European Green Deal) to achieve a net zero target by 2050 and the pathway to 2030 which would be consistent with a net zero target by 2030.

The European Green Deal provides an action plan to

- Boost the efficient use of resources by moving to a clean, circular economy
- Restore biodiversity and cut pollution

The plan outlines investments needed and financing tools available. It explains how to ensure a just and inclusive transition.

The EU aims to be climate neutral in 2050. Reaching this target will require action by all sectors of our European country economies, including:

- Investing in environmentally-friendly technologies
- Supporting industry to innovate
- Rolling out cleaner, cheaper and healthier forms of private and public transport
- Decarbonising the energy sector
- Ensuring buildings are more energy efficient
- Working with international partners to improve global environmental standards

The EU will also provide financial support and technical assistance to help those that are most affected by the move towards the green economy. This is called the Just Transition Mechanism. It will help mobilise at least €100 billion over the period 2022-2028 in the most affected regions.

Ireland through its national policies and legislation along with regional and county development plans will provide a strong planning framework that will provide a pathway for investment and change. The new Waterford County Development Plan identifies the key mechanisms, policies and objectives that are aligned with the European Green Deal so we can maximise the benefit to society.

4.3 NATIONAL

The draft Waterford County Development Plan is guided by the UN Sustainable Development Goals and will be consistent with the National Planning Framework 'Project Ireland 2040' and the Regional Spatial and Economic Strategy for the Southern Region in areas such as climate action and clean energy.

The transition to a low carbon electricity system, based on renewable energy generation and storage is a key pillar of Project Ireland 2040 – National Planning Framework. The requirement for energy security and climate action has led to increased focus on renewable energy generation in Ireland. In 2019, wind generation provided 32.5% of the electricity generated in Ireland, up from 25% in 2017. It is well recognised that Ireland has excellent renewable energy resources, with technologies such as offshore wind, tidal etc. remaining vastly untapped. Other technologies such as solar have seen major developments. The predominant source of renewable energy production in Waterford remains wind generation.

In order to achieve climate action goals, the development of further renewable energy projects is required, along with the diversification of associated technologies. There is an obligation to increase reliance from 30% to 70%, adding 12GW of renewable energy capacity (with peat and coal plants closing) across the country. There is a requirement to enable community participation in renewable generation, along with streamlining consent systems and connection arrangements. The strategic location of Waterford provides substantial opportunities for the further development of onshore renewable energy technologies and a support role for offshore technologies, through the national grid infrastructure and associated upgrades required to ensure generation can be distributed to where it is required. Continued support of renewable energy technologies and associated infrastructure will be required as part of the Waterford County Development Plan 2022-2028 to ensure local and national needs are met.

The Climate Action Plan 2019, issued by the Department of Communications, Climate Action & Environment recognises that Ireland must significantly step up its commitments to tackle climate disruption, with a local authority leadership role required to achieve decarbonisation goals. The Climate Action Plan 2019, sets out objectives in relation to renewable electricity:

- Increase reliance on renewables from 30% to 70% adding 12GW of renewable energy capacity (with peat and coal plants closing) with some of this delivered by private contracts.
- Put in place a coherent support scheme for micro-generation with a price for selling power to the grid.
- Open up opportunity for community participation in renewable generation as well as community gain arrangements.

4.4 REGIONAL

The Regional Spatial and Economic Strategy for the Southern Region has policies that relate directly to energy infrastructure and renewable energy. These are reproduced below.

Regional Policy Objective 219: New Energy Infrastructure It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.

Regional Policy Objective 220: Integrated Single Electricity Market (I-SEM) It is an objective to support the Integrated Single Electricity Market (I-SEM) as a key priority for the Region and seek the sustainable development and reinforcement of the energy grid including grid connections, transboundary networks into and through the Region and between all adjacent Regions subject to appropriate environmental assessment and planning processes.

Regional Policy Objective 221: Renewable Energy Generation and Transmission Network

- a. Local Authority City and County Development Plans shall support the sustainable development of renewable energy generation and demand centres such as data centres which can be serviced with a renewable energy source (subject to appropriate environmental assessment and the planning process) to spatially suitable locations to ensure efficient use of the existing transmission network;
- b. The RSES supports strengthened and sustainable local/community renewable energy networks, micro renewable generation, climate smart countryside projects and connections from such initiatives to the grid. The potential for sustainable local/community energy projects and micro generation to both mitigate climate change and to reduce fuel poverty is also supported;
- c. The RSES supports the Southern Region as a Carbon Neutral Energy Region.

Regional Policy Objective 222: Electricity Infrastructure It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process) to serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity.

Regional Policy Objective 225: Gas Network Subject to appropriate environmental assessment and the planning process where required, it is an objective to:

- a. Promote renewable gas leading to carbon emission reduction in agriculture, industry, heating and transport as well as sustainable local employment opportunities.
- b. Support the transition of the gas network to a "carbon neutral" gas network by 2050, which will drive Ireland and the Region to becoming a low carbon society.

- c. Support investment in the sustainable development of agricultural biogas sector and regional gas supply projects which strengthen gas networks in the Region and assist integration of renewable gas to the grid network.
- d. Support investment in developing renewable gas and provision of CNG refuelling infrastructure which will help reduce the Green House Gas emissions in both the agriculture and transport sectors and support Carbon Capture and Storage initiatives, which has the potential to decarbonise power generation at scale.
- e. Strengthen the gas network sustainably to service settlements and employment areas in the Region, support progress in developing the infrastructures to enable strategic energy projects in the Region. An example is the Tarbert/Ballylongford landbank in Co Kerry which is a strategic development site under the Strategic Integrated Framework Plan for the Shannon Estuary and support for the extension of the Gas Network from Listowel into the Kerry Hub and Knowledge Tri-Angle settlements of Tralee, Killarney and Killorglin.

Regional Policy Objective 56: Low Carbon Economy The transition to a low carbon future will see entire sectors of the economy undergo radical changes and create new types of enterprises and jobs. Our Region has enormous potential for renewable energy as well as becoming a global leader in the bio-economy. This will require investment in new skills, as well as appropriate assistance and incentives to enable enterprise to make the transition.

- a. The RSES recognises the urgency to transition to a low carbon future and it is therefore an objective to accelerate the transition towards low carbon economy and circular economy through mechanisms such as the Climate Action Competitive Fund;
- b. It is an objective to develop enterprises that create and employ green technologies;
- c. Local authorities should ensure that the development of green industry and technologies incorporates careful consideration of potential environmental impacts at project level including the capacity of receiving environment and existing infrastructure to serve new industries;
- d. Local authorities shall include objectives in statutory land use plans to promote energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock, energy efficiency in traditional buildings and initiatives to achieve Nearly Zero-Energy Buildings (NZEB) standards in line with the Energy Performance of Buildings Directive (EPBD).
- e. It is an objective to support investments in energy efficiency of existing commercial and public building stock with a target of all public buildings and at least one-third of total commercial premises upgraded to BER Rating 'B'. Local authorities shall report annually on energy usage in all public buildings and will achieve a target of 33% improvement in energy efficiency in all buildings in accordance with the National Energy Efficiency Action Plan (NEEAP).

4.5 LOCAL

4.5.1 Renewable Energy Strategy for Waterford City and County 2016 - 2030

To date, Waterford County Council has been progressive in relation to advancing and supporting the development of the renewable energy sector, as is demonstrated in the Renewable Energy Strategy for Waterford City and County 2016 - 2030. As identified in the strategy, tapping into renewable

energy resources in Waterford can help reduce the national reliance on fossil fuel imports, achieve a more secure and stable energy supply for the long term, help reduce the impacts of climate change and generate employment and economic growth for the citizens of Waterford. The vision set out in the strategy supporting the development of renewable energy projects whilst balancing the need for new development with the protection of the environment, culture and heritage is firmly supported by Greensource. The Renewable Energy Strategy for Waterford City and County 2016 - 2030 supplements and informs the county development plan.

The 2016 - 2030 strategy includes policies and objectives based on the principles of proper planning and sustainable development, including reduction of greenhouse gases, maximising community benefit, ensuring minimal adverse environmental impact and taking full account of the presence and requirement to protect Natura 2000 sites. It also sets out areas designed for the development of wind farm projects.

The strategy examines the potential for renewable energy for the city and county. It considers strategic planning factors that contribute to the development and deployment of renewable energy. The strategy underscores the significance of integrating landuse planning and renewable energy, and the requirement to strengthen the linkages through the County Development Plans, Strategic Development Zones and other relevant local plans.

As technologies have advanced, turbines have been developed which can yield the same energy from lower wind sites than their older counter parts. Greensource support the exclusion of wind resource data when developing and zoning areas for renewable energy development, both in the County Development Plan and future Renewable Energy Strategies.

Greensource also believe that grid constraints should not be considered by the local authority in the preparation of the County Development Plan and future Renewable Energy Strategies as this is identified as a developer's constraint.

4.5.2 Waterford County Development Plan

As set out in the Climate Action and Low Carbon Development (Amendment) Bill 2020, each local authority will be requested to make a plan relating to climate action. This plan will specify the mitigation measures and the adaption measures to be adopted by the local authority, with regard to national frameworks and policies on climate change. Renewable energy strategies and the ongoing support of renewable energy projects within the local authority area will be key in achieving climate action and development of a low carbon economy. As per the draft plan, climate mitigation and adaption policies and objectives are included in each chapter of the draft plan, thereby demonstrating the recognition of Waterford County Council towards the need to transition to a low carbon and climate resilient county.

The transition and implementation of the development plan is interlinked with national and European policies such as the European Green Deal, which outlines a roadmap for making the European economy sustainable, turning climate and environmental challenges into opportunities.

The implementation of the new Waterford County Development Plan 2022 - 2028 has the potential to provide an opportunity for significant habitat restoration and enhancement, clean energy by providing opportunities for alternative, cleaner sources of energy, sustainable agriculture through

landowner income associated with renewable energy developments and rural development as a result of community benefit funds associated with renewable energy developments.

Continued support of renewable energy technologies and associated infrastructure will be required as part of the Waterford County Development Plan 2022 - 2028 to ensure local and national needs are met.

In supporting the objectives of the Climate Action Plan 2019, acknowledgement must be given to the existing renewable energy developments in operation in County Waterford and the requirement for the addition of further renewable energy developments and the technological diversification of such developments including bio-mass, wind power, small scale hydro power, wave power, anaerobic digestion, solar PV, hydrogen and other such technologies which may emerge over the period of this development plan. The contribution of small-scale renewables including domestic and agricultural is likely to grow.

5 RENEWABLE ENERGY INFRASTRUCTURE IN COUNTY WATERFORD

As per Chapter 6 of the draft plan, there is approximately in excess of 215MW of renewable energy generation in operation/construction in Waterford. Approximately 90MW of wind generation is installed in Waterford, accounting for approximately 2% of Ireland's overall wind energy production. The development of the extant permissions for wind and solar projects in the county will significantly add to Waterford's renewable energy output. In the recent Renewable Electricity Support Scheme auction, 4 no. solar projects and 1 no. wind projects were successful. These projects have the potential to significantly increase the renewable energy production of Waterford by approximately 57MW.

6 DRAFT WATERFORD COUNTY DEVELOPMENT PLAN 2022 – 2028

The Draft Waterford County Development Plan 2022 – 2028 was published in December 2020. In relation to renewable energy, particular attention is drawn to Sections 6.4, 6.5 and 6.6.

The draft plan highlights the requirements for further decarbonising the economy and the development of additional renewable energy projects in the county. The plan identifies the wind resource potential in the county and the ability of this to underpin an entire new economy in the county. This economic activity is vital for redressing the trend of rural de-population, leading to more sustainable and vibrant communities.

Objective ULT13 Renewable Energy of the draft plan identifies:

It is the policy of Waterford City and County Council to promote and facilitate a culture of adopting energy efficiency/ renewable energy technologies and energy conservation, and seek to reduce dependency on fossil fuels thereby enhancing the environmental, social and economic benefits to Waterford City and County. This will be achieved by:

- *Facilitating and encouraging, where appropriate, proposals for renewable energy generation, transmission and distribution and ancillary support infrastructure facilities in accordance with the Waterford Renewable Energy Strategy, the Waterford Landscape and Seascape Character*

Assessment undertaken to inform this Development Plan, and the National Wind Energy Guidelines, or any subsequent update/ review of these.

It is noted that the categorisation of areas suitable for wind farm development in Waterford as set out in the Waterford County Development Plan 2011 – 2017 has been superseded by the new Landscape and Seascape Character Assessment. This categorises areas based on their capacity to absorb new development (least sensitive, low sensitive, high sensitivity, most sensitive).

Greensource support the classification applied as:

- Wind speeds have been excluded as a criterion for developing and zoning areas for renewable energy development.
- Grid constraints have been excluded as a criterion for developing wind energy zoning.

Greensource also suggest the following in relation to wind energy developments over the course of the proposed 2022 – 2028 plan.

- Regional approach towards wind energy zoning taking changes to neighbouring county zoning patterns into account.
- Adherence to the National Wind Energy Planning Guidelines which sets out recommendations in terms of siting and conditions at which wind farms should adhere to.
- Refrain from limiting operating periods of projects to 25 years.
- Support for projects which may enter the repowering stage during the lifetime of the development plan.
- Support of alternative renewable energy technologies including biogas, battery storage, hydrogen or other technologies which may become available over the duration of the development plan.
- Support for upgrading and reinforcement of the transmission network to fully harness the county's renewable energy potential.

It is noted in the 2016 – 2030 Renewable Energy Strategy that 131.7MW of on shore wind capacity is projected by 2030 representing approximately 17.01% of the total electricity requirement for Waterford City and County in 2030. Greensource suggest a minimum target of 250MW of on shore wind capacity is set for 2030 to ensure national targets are achieved.

7 CONCLUDING STATEMENT

Greensource is one of the leading innovative energy companies in the South West of Ireland and has a clear focus on being one of the drivers for change in the transition to a low carbon economy. In order for that to happen, companies like Greensource need clear pathways through planning and development as the typical timeline from identifying a potential site to the day it is energised can be between 3 and 8 years subject to factors like Judicial Review proceedings. In that regard the County Development Plan becomes a key instrument for industry to follow and be guided by as we move forward in time.

Greensource have completed a strategic review of the Draft Waterford County Development Plan 2022 – 2028 and support the proposed plan in relation to renewable energy and the transition to a low carbon society.