

Monday, 30<sup>th</sup> August 2021

Planning Department,  
Waterford City and County Council,  
Menapia Building,  
The Mall,  
Waterford City

[Online submission: <https://consult.waterfordcouncil.ie>]

**RE: Waterford Draft City and County Development Plan 2022-2028**

A Chara,

**1.0 Introduction**

Coillte welcomes the opportunity to make this submission to Waterford City and County Council (**'the Council'**) in response to the publication of the Draft *Waterford City and County Development Plan 2022-2028* (**'draft Plan'**) published on Friday 18<sup>th</sup> June 2021.

Coillte is the largest forest company in Ireland and, amongst other things, Coillte, and Irish forestry play a critical role in contributing to the reduction of greenhouse gas emissions, enhancing Ireland's energy security and contributing to a post-carbon and climate resilient economy.

Coillte was established as a commercial semi-state company in 1989, with a diverse forest estate of approximately 440,000 hectares of land.

Over the last 30 years, the organisation has developed the forests and strategic elements of the land bank. It has grown the estate to over 440,000 hectares, and today provides stewardship over approximately 7% of the total land mass of the country. During this time Coillte has provided the public with a huge range of benefits, from recreation to critical infrastructure (including telecoms and wind energy), to environmental services.

Coillte has approximately 900 employees across Ireland and the UK, and comprises four discrete businesses; Forestry, Land Solutions, Renewable Energy and Medite Smartply (Panels) with a vision to create a sustainable future from our forests and lands.

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The forest sector provides around 12,000 jobs today, mostly in rural Ireland. Coillte's Forestry business underpins a thriving export-led Forest Products Sector which supports circa €2.3 billion of economic activity. Coillte grows forests sustainably to produce quality wood and wood products. Ireland's forest industry will approximately double in size over the next 10 years and Coillte will be at the core of this initiative with an innovative supply chain and a consistent reinvestment in the next generation of forests. Our forests and forest products are playing an increasingly important role in mitigating the effects of climate change.

Coillte is also Ireland's leading provider of outdoor recreational activities nationally, with over 3,000km of hiking trails, 12 forest parks and 260 recreational sites, including those located in County Waterford. Every year it is estimated that there are over 18 million visits to our forests nationwide for outdoor recreation activities.

Within Coillte, **Land Solutions** and **Renewable Energy** are active asset development and management businesses providing innovative commercial solutions to enable the attainment of key national policy objectives particularly those that are prescribed by the National Planning Framework (2018). The businesses span a wide range of industries including renewable energy, housing, healthcare, education, inward investment, infrastructure development, water, tourism and agriculture. Coillte has a longstanding heritage in the spheres of sustainability, recreation and community and a significant track-record in the renewable energy arena (specifically on-shore wind through the development and construction of four wind farms totalling 230MW representing a total investment of over €400 million between 2010-2017). The Renewable Energy business also has a very high level of ambition in terms of delivery of new wind energy infrastructure in the period to 2030 and beyond.

In June 2019, Coillte established a new not-for-profit entity, **Coillte Nature**, which is dedicated to the restoration, regeneration and rehabilitation of nature across Ireland. Coillte Nature is seeking to deliver significant impact on the climate and biodiversity crises through innovative projects-of-scale across four strategic themes:

- 1) Reforesting by planting new native woodland
- 2) Restoration of important biodiversity habitats
- 3) Regeneration of urban forests
- 4) Rehabilitation of critical ecosystem services

Since January 2020, the team has been working across a number of large-scale projects such as the Dublin Mountains Makeover, the Midlands Native Woodlands Project, Wild Western Peatlands and Restoring Hazelwood Projects. Coillte Nature will continue to see new collaborations, partnerships and projects rolled out under these themes, to benefit nature, people and the climate.

## **2.0 Submission to Waterford County Council on the draft Development Plan 2022-2028**

### **2.1 Tourism / Recreation, Community**

Coillte has a strong tradition of working with communities and stakeholders, including local authorities, and is committed to working closely with Waterford City and County Council to deliver on local and wider needs in a manner which aligns with the overall vision for the county.

Coillte are rooted in communities all over Ireland and our record of providing land for and facilitating local sports clubs is a good demonstration of that local commitment. Coillte will continue to work with communities and the Council to facilitate the development of a wide range of accessible recreational, community and sporting facilities, ranging from playing pitches, clubhouses to walking and bike trails.

Coillte is particularly proud to have helped deliver significant recreational developments including Centre Parcs in Longford. The development of this site created 750 jobs during construction and resulted in over 1,000 long term associated jobs. It is estimated that Centre Parcs at Ballymahon will generate in the region of €30 million per annum to the local economy.

### **2.2 Forestry**

As noted above, Ireland has a vibrant forest industry today which supports over 12,000 jobs mostly in rural Ireland. Despite having the lowest forest cover in Europe at just 11% compared to a European average of over 40% this sector contributes over €2.3 billion annually to the economy.

Ireland has a competitive advantage for tree growth, our natural oceanic climate and mild winters means that certain conifer tree species can reach commercial maturity in just 35 years which can often take up to 80 years in central and northern Europe. The wood grown from these Irish trees is a valuable commodity and is used for a variety of applications, in construction, in pallet manufacturing and in the processing of innovative panel board products among others. Using Irish, locally grown, wood and wood-based products for construction is a climate efficient and sustainable substitute for conventional carbon heavy construction products, such as concrete, brick and steel.

The regulation of the forestry sector is overseen by the Department of Agriculture, Food and the Marine who ensure that all the environmental, economic and social aspects of forestry and forest operations are considered fully before licenses to carry out operations are issued. The issuing of licenses may also be challenged and queried by the public and subject to a robust framework of appeal overseen by the Forestry

Appeals Committee. The Department has oversight of the primary legislation governing all aspects of forestry in Ireland, The Forestry Act 2014 and this Act is specifically cognisant of growing forests for a variety of benefits to Irish society, including biodiversity, recreation and wood production.

The ownership of Irish forests today is approximately 50% privately owned and 50% State owned and many private owners (over 21,000 in total in Ireland) have invested significantly in growing their forests to commercial maturity. In addition, all the State's Forest management practices are fully certified as sustainable according to precise national and international criteria.

Coillte note that the regulation of forest practices and policy resides with the Department of Agriculture, Food and the Marine and their professionally qualified inspectorate. Given the current issues emerging around climate change and the ability of sustainably grown wood products to address this challenge our forests and forest management practices have never been more relevant.

In this context, it is respectfully requested that the Council consider the inclusion of reference, as appropriate, to the regulatory framework established under the Department of Agriculture, Food and the Marine, while nonetheless continuing to support the forestry industry in the county.

### **2.3 Renewable Energy**

As the custodian of c. 7% of the total land mass of the State, Coillte has cultivated experience in forestry management, outdoor recreation and nature conservation projects to develop a Company that endeavours to work with nature and create enduring value and deliver the multiple benefits from our forests and land while leaving an enriched resource for the next generation. Full consideration is given to the wider spatial and environmental aspects of our all our business operations, and this has enabled Coillte to strategically identify and develop a high-quality portfolio of wind development projects across the estate.

Over the past decade, Coillte has built up a strong track-record in the Irish renewable energy sector, both as a land supplier and developer. Coillte believe they can continue to make a very significant contribution to enabling Ireland to attain its energy related low carbon transition objectives and has already enabled in excess of 30% of all installed wind farms through wayleaves/rights of way and as a land supplier and developer.

It is important to note that the Coillte Renewable Energy business unit (**Coillte RE**) is in the late stages of transitioning to a new stand-alone joint venture company, in conjunction with the ESB. Once established, this new joint venture entity will be one of the largest dedicated developers of onshore wind in Ireland. The transaction completion is subject to final shareholder approval.

## Climate Action Urgency

The greater urgency with which the world is required to address climate change through ambitious targets was recently reflected in the recent reporting of the Intergovernmental Panel on Climate change ('IPCC') and the report published earlier this month by the Environmental Protection Agency ('EPA'). On the 9<sup>th</sup> of August, the IPCC published its 6th Assessment Report (AR6) with the overarching assertion that, "*It is unequivocal that human influence has warmed the atmosphere, ocean and land*". This report confirms with alarming certainty the detrimental and linear relationship of CO<sub>2</sub> emissions and global temperature rise in D1.1<sup>1</sup>:

*"This Report reaffirms with high confidence the AR5 finding that there is a near-linear relationship between cumulative anthropogenic CO<sub>2</sub> emissions and the global warming they cause.....This relationship implies that reaching net zero anthropogenic CO<sub>2</sub> emissions is a requirement to stabilize human-induced global temperature increase at any level, but that limiting global temperature increase to a specific level would imply limiting cumulative CO<sub>2</sub> emissions to within a carbon budget."*

The detrimental effects of rising global temperatures are evidenced in regionally intensified weather patterns. Severe heat waves that happened only once every 50 years are now happening roughly once a decade. Tropical cyclones are getting stronger. Most land areas are seeing more rain or snow fall in a year. Severe droughts are happening 1.7 times as often while fire seasons are getting longer and more intense. Ireland is not immune to these climatic changes, with average temperatures exceeding long-term averages in 23 of the past 25 years.

Also, in this month, the EPA published "The Status of Ireland's Climate 2020", which clearly shows that the country is becoming warmer and wetter while sea levels and greenhouse emissions are rising. Extreme weather events, such as droughts and wet spells, are becoming more frequent and lasting longer, and already detrimentally impacting our ecosystem, crops and coastlines. The urgency with which Ireland and the rest of the world need to tackle climate breakdown is clear and reflected in our national targets, with the energy sector a key component in reaching decarbonization.

## The Challenge of our Generation and Renewable Energy Targets.

The **2020 Programme for Government** commits to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) and to move to net zero emissions by 2050. The 2050 target was set into law by the Climate Action and Low Carbon (Amendment) Bill 2021 as passed through the Oireachtas and signed into law 23<sup>rd</sup> July 2021. This increases the CAP offshore target to 5GW; proposes a strengthened role for the Climate Change Advisory Council, proposes an annually revised Climate Action Plan and new oversight and accountability by the Oireachtas. Every sector, including the energy sector,

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<sup>1</sup> IPCC AR6 WGI 'Summary for Policy Makers': [https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC\\_AR6\\_WGI\\_SPM.pdf](https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf)

must contribute to meeting the 2050 target by implementing policy changes as outlined throughout the programme for government.

Other sectors, namely transport, the built environment, agriculture and industry are also tasked with significant CO<sub>2</sub> emission reductions but of a comparatively lower order namely 37.5%, 31.25%, 7.5% and 6.25% respectively. This makes transforming the electricity sector the single greatest lever in the CAP in terms of CO<sub>2</sub> reduction (Ref. EirGrid Strategy Launch 2019, CEO presentation).

On 17<sup>th</sup> June 2019 the Government published the ‘**Climate Action Plan 2019**’ (CAP). This sets out the agreed course of action over the coming years to tackle climate breakdown. It is a visionary and transformational plan and at its heart recognises that “*We [Ireland] are close to a tipping point*” and “*decarbonisation is now a must if the world is to contain the damage and build resilience in the face of such a profound challenge.*” (Exec. Summary pg. 8). In particular, the CAP places the decarbonisation of the electricity sector at the centre of its ambitions. In real terms it mandates this sector to move from 12 million tonnes of CO<sub>2</sub> equivalent emissions in 2017, to 4.5 million tonnes by 2030. In other words, a massive reduction of 7.5 million tonnes (62.5%). The 2019 CAP provides a roadmap of what must be achieved and requires 70% of electricity demand of all our demand to come from renewable energy sources by 2030. This almost doubles the previous target of 40% by 2020. To achieve the 70% target, the CAP earmarks a target of 3.5GW off-shore wind and a **doubling of existing on-shore wind from circa 4GW (today) to 8.2GW by 2030, signalling onshore wind as crucial in the roadmap to decarbonization.**

To put the scale of the ambition into further context it should be noted that it has taken 20+ years to achieve the current level of renewable penetration onto the Grid. The challenge is now to achieve twice as much in half the time. This is of particular significance in the context of the lifetime of the draft Plan to 2028.

The criticality of onshore wind in Ireland’s energy mix is apparent when the near-term trajectories in the **Clean Energy Package Governance Regulation (2018)** are considered. This requires all member states to submit National Energy and Climate Plans (NECP) setting out how each member state will contribute to the decarbonisation objectives of the European Union. Section (34) of the document notes (emphasis added):

*“Integrated national energy and climate plans should be stable to ensure the transparency and predictability of national policies and measures in order to ensure investment certainty. National plans should however be updated once during the ten-year period covered to give Member States the opportunity to adapt to significant changing circumstances. For the plans covering the period 2021 to 2030, Member States should update their plans by 30 June 2024. **Objectives, targets and contributions should only be modified to reflect an increased overall ambition in particular as regards the 2030 targets for energy and climate.** As part of the updates, Member States should make efforts to mitigate*

*any adverse environmental impacts that become apparent as part of the integrated reporting”.*

As Ireland continues to reshape its energy generation fleet and electrifies its economy (including the heating and transport sectors) in line with enunciated energy and environmental policy objectives, there is an expected demand for c. 4GW of new onshore wind facilities in Ireland in the decade to 2030. Coillte recognises the Government’s ambition set out in the Climate Action Plan and seeks to contribute up to 1GW of new onshore wind capacity in Ireland in the period up to 2030. By leveraging a unique land bank which enables the development of an unmatched portfolio of large high-wind sites, this target can and will be met.

The targets discussed will not be achievable without a functioning onshore wind sector, and there is likely to be considerable reliance on wind to deliver on our intermediate targets to 2025 and 2027. Given the relatively high likelihood that a significant portion of new offshore capacity will only start to be delivered onto the system post 2027, (and in volumes that may fall short of the targets set out in the NECP), these requirements clearly point to a need to maintain focus on the delivery of new onshore capacity, which will be better placed to support these earlier intermediate targets, in addition to making a material ongoing contribution to the long term decarbonisation targets.

There is a strong policy signal that ambition levels will only be increasing over the course of the decade and wind energy will continue to have a lead role. It requires policy leadership at a both national and local level to ensure the national ambition and needs are reflected in County Development Plans to tackle the impending crisis outlined by the IPCC and EPA reports. This emphasises the criticality of strong local policy and the significance of the Waterford County Development Plan 2022-2028 which will inform the Waterford County Renewable Energy Strategy (**‘RES’**) for the coming decade.

Coillte are actively engaged in the CDP consultation process both as a land use Company and through contribution to Wind Energy Ireland (WEI) submissions. A number of recommendations are outlined in the following sections to aid the development of a robust and scientific Renewable Energy Strategy for Waterford.

### **Waterford Policy**

Coillte believes that planners working in all tiers of government (national, regional, local) and the planning profession in general needs to step forward and frame this national CO<sub>2</sub> reduction ambition and the associated requirement for renewable energy, in the form of **plan-led ‘Renewable Energy Strategies’ (RESs) as an utmost priority**. Coillte is familiar with Waterford’s current Renewable Energy Strategy (Appendix 7) and anticipates the revision of the RES as outlined in policy objective UTL 12.

In consideration of the urgency and ambition required to decarbonize the electricity sector outlined above,

**Coillte requests the RES, in the form of the proposed “integrated Energy Strategy / Masterplan” is published for consultation as a matter of priority. This should set a clear agenda for renewable energy development in the county with associated timeframes, targets and policy supports.**

The need for each county to consider the national renewable energy targets in the Climate Action Plan to achieve an additional 4GW of energy was mentioned by the Planning Regulator, Mr. Niall Cussen in his remarks at the Joint Committee on Climate Action debate on Tuesday, 23rd Feb. 2021, Decarbonising Transport: Discussion<sup>2</sup>. He said:

*“Turning briefly to improving the sustainability of our energy sources, communities want real action on climate. One of the best ways to tap that desire would be to show how every county in the country could play its part in delivering an estimated extra 4 GW of renewable electricity to 2030 and, indeed, more offshore energy generation to a carbon-free society by 2050. Yet our assessments of some local authority development plans find effective bans on the roll-out of sustainable energy sources. On top of the updated Wind Energy Development Guidelines we need a national renewable energy roadmap with county-specific targets and the designation of sustainable energy zones which can be built by the regional assemblies working with the local authority climate action regional offices.”*

*The Planning Act under section 10(2)(n) already demands forward planning that reduces future patterns of energy consumption, shifts our present energy needs towards renewable sources and adapts to climate changes already happening. The pace in implementing this law is quickening since the publication of the NPF, the establishment of our office and the coming into being of local authority climate action plans under the legislation promised. Local government and local authority planning, however, has a central role to play in the Avoid-Shift-Improve approach I mentioned but it needs clear policy frameworks and resources to work with to ensure that local authority members focus on the task at hand.*

*Notwithstanding this and our statutory mandate, legislated for by the Oireachtas and supported by the Minister for Housing, Local Government and Heritage, we will work to ensure that all the constituent cogs in our country’s planning process work together in the planet’s and not just in local interests.”*

Coillte has been advocating a regional approach to Renewable Energy Strategies (RESs) in line with RPO 98<sup>3</sup> of the Southern Regional Spatial and Economic Strategy in all its submissions over the last number of years. This would complement the local authority’s individual RES’s and WES’s. In the absence of a Regional RES and in

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<sup>2</sup> Joint Committee on Climate Action debate - Tuesday, 23 Feb 2021 (oireachtas.ie)

<sup>3</sup> RPO 98: It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders



the context of the current County Development Review cycle, Coillte have made a number of suggestions as to how each local authority could update / prepare its RES.

**In summary, Coillte respectfully suggests each local authority engage closely with neighbouring local authorities in the Region for a clear alignment on the benefits and synergies for a regional RES approach.**

A regional steering group comprising planners from each local authority and/or SRA, would be optimum. A set of guiding principles would be agreed and used by all local authorities in developing local authority RES's. To this end the methodology and principles set out in "SEAI's Local Authority Renewable Energy Strategy" (2013) remain valid and should be considered. This approach would also ensure county targets are linked to the overall national ambition, as suggested by the Planning Regulator, rather than being based on the individual county demands. Chapter 6 of the draft Plan indicates that, "*A detailed and comprehensive energy assessment, incorporating a Spatial Energy Demand and Generation Analysis,*" will inform the targets set out in the RES. A regional approach would ensure a sufficient quantum of land (with sufficient headroom) is identified to account for site level attrition and focus on national targets. **Each county RES would ensure that wind speed, site specific engineering issues, and existing grid capacity issues are not considered constraints in identifying suitable lands.**

In relation to grid capacity, Coillte recommends that existing constraints are not considered hard constraints when preparing RES's. This is because, amongst other things, the development of the Grid will react to (planning) consented developments where necessary. This means that a planning consent, or indeed a critical mass of planning consented projects triggers grid development/reinforcement where necessary. This issue of existing grid availability was recognised in the SEAI (2013) document which suggested that "*local authorities may consider policies and objectives which could underpin and support infrastructure and network deployment to achieve national energy targets while realising local RE potential*". Coillte supports the delivery and upgrading of grid infrastructure to facilitate Renewable Energy potential and the policies and objectives on this in the Draft Plan.

Coillte commend the Council on the 215MW of current renewable energy generation capacity in County Waterford, 90MW of which is operational onshore wind. County Waterford has several enabling factors which position it to contribute positively to our national onshore wind targets. The well-connected national road network and the economically successful Port of Waterford coupled with a strong grid network allow Waterford to facilitate onshore wind energy developments in the present time and to meaningfully contribute to national government targets as set out earlier. These enabling factors, and not all present in other counties, can underpin a plan-led and scientifically based RES for Waterford which addresses the ambition in our national targets towards decarbonisation during the lifetime of the Plan and beyond.

## **Waterford's Renewable Energy Potential and RES 2016 – 2030**

Coillte recognise the quality of Waterford's Renewable Energy Strategy 2016-2030 ('current RES') in Appendix 7 of the draft Plan as a well-developed policy instrument that has informed the development of 215MW of renewable energy in the County with the strategic aim, *"To identify opportunities for various renewable energy technologies and resources appropriate to Waterford."* This plan has formed the basis; *"To maximise the opportunities for renewable energy development whilst safeguarding the environment and other amenities, subject to Strategic Environmental Assessment and Habitats Directive Assessment requirements."*

Coillte, along with our partners, has developed a number of wind farm projects which conscientiously incorporate the wider environmental considerations while providing recreational amenities for local communities through which to enjoy the outdoors, such as Galway Wind Park, Sliabh Bawn, Castlepook and Raheeleagh Wind Farms. Coillte believe there are potential opportunities to develop appropriate wind energy projects within County Waterford, these developments can provide a great opportunity to deliver upon the RES, with one that fully reflects the urgency and ambition of our national targets.

In the context of national government targets since 2016, the Draft Plan and subsequent RES need to set out more distinctly how the County will facilitate a proportionate level of the additional 4.2GW of onshore wind growth as a matter of priority and to comply with SPPR No. 2 of the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (Dept. of Housing, Planning, Community and Local Government) July 2017. The current RES fails to set out clearly how its policies and designations for renewable energy will contribute to the national renewable energy targets.

In relation to compliance with SPPR No. 2, this states:

*It is a specific planning policy requirement under Section 28(1C) of the Act that, in making, reviewing, varying or amending a development plan, or a local area plan, with policies or objectives that relate to wind energy developments, the relevant planning authority shall carry out the following:... (2) Indicate how the implementation of the relevant development plan or local area plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts); and...*

The absence of these specific targets and supporting policies fails to acknowledge that counties with renewable energy potential, like Waterford, should do more than others with less potential in order to achieve the Country's national targets. In other words, all counties, including Waterford, must focus on national targets not individual demands as previously outlined and must confirm their potential wind energy contribution in

MW in order to comply with SPPR 2. This was addressed most recently by the Office of the Planning Regulator (OPR) who specifically requested Offaly County Council to indicate how the Offaly County Development Plan 2021-27 would contribute to realising overall national targets on renewable energy and climate change mitigation<sup>4</sup>, which had been absent in the Offaly Draft Plan. The County Manager subsequently fixed a target of 466.3MW.

Coillte's technical team has undertaken an analysis of the wind energy development potential in hectares (ha) of the Wind Energy Strategy (WES) in Appendix 2 of the Current CDP. The analysis examines all remaining lands designated as 'Preferred' and 'Open to Consideration'. Our analysis applies a setback of 680m from all dwellings with an Eircode. This setback is based on a typical present day turbine model of 170m tip height and a 4 x tip height set back, which is a standard in the Draft Wind Energy Development Guidelines 2019 (noting recent An Bord Pleanála decisions have permitted turbines up to 185m which would require greater setbacks. Coillte has long been an advocate of a 750m setback). Parcels of land less than 125ha are then eliminated because they are not considered viable as a utility scale (i.e. a non-domestic wind farm) wind farm for which a threshold size of 25MW is considered needed. In our view this is the lower size range necessary to participate successfully in a competitive Renewable Energy Support Scheme ('RESS') auction.

Based on this assessment, the developable area of sites >125ha in the 'preferred lands' is 2,736ha and for 'open to consideration' lands are 3,020ha, or 547.2MW and 604MW respectively. However, in practice and as determined in detailed constraints mapping, this is a significant over-estimate because there are very many more impediments to developing these lands such as landowner interest, survey findings, sensitive habitats, steep slopes, buffers from streams, roads and overhead lines, telecommunications links, etc. that will further reduce their potential. For example, Coillte has a wind farm project currently in the planning process which has undergone a significant capacity reduction through the development process. The planning application is for a project with a stated capacity that is 30% less than the gross capacity if applying only a 4x tip height setback from Eircode's. The project has undergone a full EIAR constraints mapping process to determine the net area ultimately deemed suitable to progress with a planning application. A size reduction of this order is very typical following an EIAR constraints mapping process and highlights that the quantum of lands designated in County Development Plans must be many times greater than the actual quota, to manage for attrition to meet delivery targets.

### **Landscape Seascape Character Assessment (Appendix 8)**

Again, Coillte generally welcome the Council's commitment to, "*facilitate and encourage (where appropriate) proposals for renewable energy generation, transmission and distribution, in accordance with the Waterford Renewable Energy Strategy, the Waterford Landscape and Seascape Character Assessment undertaken to*

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<sup>4</sup> <https://www.opr.ie/wp-content/uploads/2021/07/2021.07.16-OPR-Submission-Letter-MAs-to-draft-Offaly-CDP.pdf>

*inform this Development Plan, and the National Wind Energy Guidelines, or any subsequent update/review of these. “It is assumed that the “...Waterford Landscape and Seascape Character Assessment undertaken to inform this Development Plan,” will also inform the updated RES for the county and will be considered in relation to renewable energy developments. However, further to the pressing need to do more in a shorter period, and through technical analysis and previous experience of reviewing LCAs, Coillte have identified the following gaps in the draft LCA:*

1. **Over Emphasis on Visibility**
2. **Uniformly classifies landscape types that traditionally host wind energy developments as higher sensitivities**
3. **No ‘medium sensitivity’**

This document needs to be objectively developed and robust enough such that it can be used by all stakeholders to deliver the best outcomes. Although wind energy is not mentioned specifically, the draft LCA in its current form would eliminate the majority of land in County Waterford that is normally considered appropriate for wind energy developments.

### **Over Emphasis on Visibility**

According to the IEMA Guidelines for Landscape and Visual Assessment (2013), ‘Landscape Impacts’ and ‘Visual Impacts’ are to be assessed separately. Landscape impact assessment considers the landscape as a resource and is concerned with physical effects on landform and land cover and the resulting changes to landscape fabric and character arising from a specific development, while visual impacts relate to views experienced at particular locations. As the draft LCA includes scenic designations it follows that the LCA must take account of the difference between landscape character and visual amenity. Coillte has observed little distinction in the case of the draft LCA for Waterford and consider there is an over emphasis on visibility as a criterion for sensitivity in a landscape.

This is highlighted further in section 3.2 ‘Disproportionate Visual Impacts. Again, Coillte observe that the emphasis is on the extent of visibility, which is used as the singular policy focus. Similarly, Coillte observe that the ‘Degrees of Sensitivity’ in section 3.3 are heavily reliant on the extent of visibility of development rather than the effects on landscape character. Coillte consider that it is challenging to apply this approach appropriately for certain developments such as wind energy developments.

### **Uniformly classifies landscape types that traditionally host wind energy developments as higher sensitivities**

The Landscape Character Types of the ‘Uplands’ and the ‘Foothills’ have been classified as ‘Most Sensitive’ and

‘Increased Sensitivity’ respectively. Coillte recognise and support the importance of protecting the character and visual quality of ‘Most Sensitive’ and ‘Increased Sensitivity’ areas in Waterford. However, it is important to note that wind farms are required to be developed in areas of lower populations and higher wind speeds, traditionally in landscape types like foothills and uplands. It is also important to note that wind turbines are tall structures. Modern turbines are in the region of 150 – 185m+ in height, therefore such projects are inevitably going to be visible over wider areas. Individual projects can be designed and laid out in a way that are sensitive and appropriate to a particular landscape type. This has been demonstrated in numerous projects across the country including upland forestry sites such as Sliabh Bawn and Raheenleagh. Furthermore, Landscape and Visual Impact Assessments (LVIA) are an integral aspect of the EIAR process which inform the design of wind farm proposals and as set out in planning applications. These surveys take account of both the Visual Impact and the Landscape Character of the wind farm location.

### No ‘Medium Sensitivity’

Coillte’s final observation is the binary approach to the landscape sensitivity classification. There is no medium sensitivity category. This results in low / lower sensitivity and high / higher sensitivity classifications which leaves potential development sites bordering high / low sensitivity landscapes open to ambiguity.

**As presented, the ‘increased sensitivity’ of the Foothills landscape type in the draft LCA will have a significant and detrimental impact on potential wind energy developments in the landscape type typical of such development throughout the country.** Coillte have reviewed some of the established and extant wind energy developments within County Waterford. This confirms that wind energy developments are consented and therefore considered appropriate within or proximate to areas within ‘most sensitive’ and ‘increased sensitivity’ as described in the draft LCA. Coillte would request that the ability of wind energy developments to absorb into areas of higher sensitivity is recognised by virtue of their locational requirements in a rural setting and their unique scale and massing i.e. slender and tall structures.

Considering the observations above and in the context suitably deploying our natural resources to achieve our national targets, Coillte respectfully request that **the specific criteria of wind energy development is considered in the draft LCA and areas of higher sensitivity such as the Foothills are considered [objectively] positively for wind energy development.** This is necessary if a sufficient quantum of land is to be identified.

### Wind Energy Development Guidelines & Noise

Coillte welcome the Council’s reference to the Wind Energy Development Guidelines (WEDG) throughout the Draft Plan and in particular, Section 5.2.4, *Development Management Standards* (emphasis added):

*“All applications for wind farm and wind energy developments should be compatible with the **2006 Wind Energy Development Guidelines issued by the DoEHLG (or any updated revision of same)** and the Waterford Renewable Energy Strategy (Appendix 7), regard should also be had to the Waterford Landscape and Seascape Character Assessment (Appendix 8).”*

The WEDG 2006 (and any future update thereof) are the national standards that apply to all wind energy developments in every county in Ireland. The Draft 2019 Guidance is still under review with the final publication expected Q3 2021. Appropriate noise standards and associated guidelines for wind energy development are set in the WEDGs and are being considered by the Department in the latest Draft. As such, **reference to the World Health Organisation’s 2018 Environmental Noise Guidelines for the European Region in policy objective UTL 14 of the draft Plan should be removed to ensure it does not conflict with national guidance.**

### **Renewable Energy and Economic Growth**

The Energy Sector is a key sector for job growth, throughout the lifetime of the Plan. Wind Energy development can generate significant construction and operation jobs throughout its lifetime and contribute to rural communities through community benefit funds and to the local authority through rates.

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

Coillte is also committed to ensuring that local communities’ benefit from having a wind farm in their locality in terms of a Community Benefit Fund which supports the development of local recreation amenities and provides additional community project funding. Community benefit schemes relating to Renewable Energy Support Scheme (RESS) projects will have significant community benefit, providing an opportunity to transform rural communities where projects are located. The Public Consultation on Good Practice Principles for Community Benefit Funds under the RESS<sup>5</sup> published 30<sup>th</sup> March 2021 provided welcome guidance on Community Benefit Funds administration, structure, and quantity, indicating a typical 50MW project will create approximately €300,000 annually. Coillte are also working hard around Community Investment and examining how communities could be given the opportunity to invest in a wind farm project.

Coillte is an active member of the Wind Energy Ireland (WEI, formerly called IWEA) and our staff actively

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<sup>5</sup> (DoECC, 2021) “Community Benefit Funds – Good Practice Principles Handbook” <https://www.gov.ie/en/consultation/995be-public-consultation-on-good-practice-principles-for-community-benefit-funds-under-the-renewable-electricity-support-scheme/>

participate in several of the Association’s committees. WEI statistics confirm that in terms of initial capital investment, every megawatt (MW) of wind energy capacity installed gives rise to an investment of approximately €1.25 million. Ongoing investment and economic development benefits during the 30+ year operational lifespan of wind farms, take the form of rents payable to landowners, financial support for local communities in the form community benefit schemes and commercial rates payable to local authorities. Combined, these amount to approximately €25,000 per MW per annum. A review carried out by WEI indicated over €900,000 was paid to the Council from wind farms in the form of commercial rates in 2020. This is a consistent and reliable annual income stream that meaningfully contributes to local authorities’ annual exchequer funding sources.

Therefore, Coillte believe that wind energy is of strategic importance to the county both in addressing Climate Change and in growing the Waterford economy and providing employment opportunities in both rural and urban communities.

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

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

### **3.0 Conclusions**

Coillte welcomes the opportunity to make this submission to Waterford County and City Council with respect to the making of the draft *Waterford County Development Plan 2022-2028*. Coillte has engaged positively with the Council throughout the years and wishes to continue this important collaboration.

With respect to renewable energy, Coillte believe that Coillte Forestry, Land Solutions and Renewable Energy businesses and Coillte Nature have the experience and expertise to support the Council to realise one of the Region’s key principles around climate action. In this regard, the following are key asks of the Local Authority in the preparation of the final Plan with respect to renewable energy:

- The specific criteria of wind energy development are considered in the draft LCA and areas of higher sensitivity such as the Foothills are considered [objectively] positively for wind energy development.
- The RES, in the form of the proposed “integrated Energy Strategy / Masterplan” is published for consultation as a matter of priority.
- Ensure that wind speed, site specific engineering issues, and existing grid capacity issues are not

considered constraints in identifying suitable lands in the updated RES and ensure a sufficient quantum of land (headroom) is designated suitable for wind to account for site level attrition through a scientific approach.

- Remove reference to the *World Health Organisation's 2018 Environmental Noise Guidelines for the European Region* in policy objective UTL 14 of the draft Plan.

If you have any queries in relation to any points raised in this submission, we would be happy to engage with you to discuss and welcome the opportunity to do so. Please contact the undersigned.

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