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Material Amendments to Draft Mayo County Development Plan
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CH 11.2, 11.5 & 11.6, Sections 11.7.5 & 11.7.12, Mayo Renewable Energy Strategy (pg.212 & 216)

Chapter: Volume One - Written Statement» 11. Climate Action & Renewable
Energy

SSE welcomes these amendments. It is essential to inject an urgency into our efforts to reduce dependency on fossil fuels and transition to low carbon alternatives. Prioritising a review and update of the Mayo Renewable Energy Strategy (RES) within one year of adopting this plan will help to achieve that. This is a very welcome move and one to be commended.

The rapidly evolving nature of the renewable energy sector and the continuing technological advancements in the field demand that policymakers keep pace. The importance of which has been demonstrated most recently in the European and national level response to the current challenge of energy security prompted by the volatility of global energy market prices and the political and economic instability caused by the current war in Ukraine. By enshrining a requirement to review and update the RES within a year of adopting this plan, Mayo County Council is ensuring the county will not lag where essential policy relating to the challenges and opportunities of decarbonisation are concerned.

This is consistent with the initiative previously shown by the local authority when it prioritised the early adoption in 2011 of a sieve analysis approach to identifying areas suitable for future wind energy development. Indeed, given the fact that the local authority has been ahead of the curve on such matters it is even more important that the RES be reviewed and updated with urgency to ensure those gains are not allowed to drift.

Taking for example the sieve analysis, though an important step forward in setting policy relating to wind development, the policy landscape has shifted considerably since originally adopted. SSE would like to see the methodology altered to better reflect the 'real' viability of these strategically designated lands. This is particularly the case considering additions to policy in this area. The Draft Wind Energy Guidelines (2019), for example, specify a project-level requirement for a minimum of 500m setback from individual properties. When this requirement is taken account of within a sieve analysis, it dramatically reduces the amount of available land for strategic wind energy developments. This poses a significant problem and is likely to undermine the Council's ability to deliver on its aim to facilitate the transition to a low carbon and climate resilient society (proposed amendment CH 7.1, Section 7.1, Strategic Aim (pg.131)).

As it currently stands, the RES does not effectively consider any site or project specific environmental/planning constraints that may influence whether these strategic sites could feasibly accommodate wind energy infrastructure without giving rise to significant effects to the receiving environment. The application of strategic considerations which is necessary within any plan does not fully capture existing constraints.

For example, the current Mayo RES has designated c. 10% of Co. Mayo (56,560ha) under the tiered wind energy strategy, which is further defined (% - total hectare) below under each tiered designation:

- Priority: c. 1% (5,766ha)
- Tier 1 (Preferred - Large Wind Farms): c. 2.3% (12,919ha)
- Tier 1 (Preferred - Cluster): c. 1.9% (10,733ha)
- Tier 2 (Open for Consideration): c. 4.8% (27,142ha)

As such, while a total of 56,560ha of strategically designated lands for wind energy is impressive on first consideration, it is unfortunately a significant over-estimation of available lands capable of accommodating wind energy infrastructure when other project and land attrition considerations are included.

This is considered in some depth within SSE's response to the local authority's consultation on the Draft County Development Plan (view here at pg. 9-11), however Table 1 below sums up the topline numbers of the analysis we commissioned on the discrepancy between projected and probable viability of land identified for strategic wind energy development.

Table 1. Constraints Mapping Percentage Change

Strategic Wind Energy Designation	Total Area Designated Under RES	Total Area Designated Following Viability Assessment Mapping	Percentage Change
Priority	5,766ha (c. 1%)	3,739ha (c. 0.7%)	35% decrease
Tier 1 – Preferred (Large Wind Farms)	12,919ha (c.2.3%)	6,739ha (c. 1.2%)	48% decrease

Tier 1 – Preferred (Cluster)	10,733ha (c. 1.9%)	1,034ha (c. 0.2%)	90% decrease
Tier 2 – Open for Consideration	27,142ha (c.4.8%)	9,598ha (c. 1.7%)	65% decrease

It should be caveated that the calculation of these revised land quantities assumes that all strategically designated lands are available for the development of wind energy infrastructure and does not take into consideration landowner preference. It is therefore reasonable to assume that the estimated quantum of viable land for developing wind energy infrastructure within Co. Mayo remains over-estimated within this analysis. This has significant implications for SSE as a Developer as these constraints can become barriers to facilitating new opportunities and further advancing renewable energy generation.

It remains our view that sites in strategically designated areas must be better used to allow for optimal project design and outputs, while respecting environmental sensitivities. Specifically, Mayo County Council should encourage the use and incorporation of periphery lands with 'low' planning and environmental constraints/sensitivities into projects being developed at strategic designations ('Priority', 'Tier 1' and 'Tier 2').

SSE, therefore, welcomes the commitment to review and update the RES within a year of the CDP being adopted and to prioritise wind energy development wherever feasible, subject to the principles of proper planning and sustainable development.

Documents Attached: No