

Forward Planning,
Mayo County Council,
Aras an Chontae,
The Mall,
Castlebar,
Co. Mayo,
F23 WF90

Online submission

22nd April 2022

Dear Sir/Madam,

Re: Mayo County Development Plan 2023-2029 Proposed Material Amendments

Thank you for providing an opportunity to consult on the above matter. This submission is made on behalf of FuturEnergy Ireland.

FuturEnergy Ireland (FEI) is the recently launched joint venture company owned on a 50:50 basis by Coillte and ESB. This collaboration combines the State's strongest assets and expertise in onshore renewable energy development on behalf of the people of Ireland. We are one of the largest dedicated developers of onshore wind in Ireland and our mission is to maximise the potential of our national resources and accelerate Ireland's transformation to a low carbon energy economy.

Importance of On-Shore Wind

The Climate Action Plan (CAP) 2021 requires 80% of our electricity to come from renewable sources by 2030 comprising up to 8,000MW of onshore wind, approximately doubling what is being produced today. FEI is currently targeting the delivery of 1,000 MW of new onshore wind projects in this period, largely enabled by Coillte lands across Ireland.

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 with a regulatory framework yet to be formally established and become operational, there is real potential that volumes may fall short of the targets set out in the National Energy Climate Plan 2021¹, increasing the reliance on onshore wind.

The criticality of onshore wind in Ireland's energy mix is further apparent when the near-term trajectories in the Clean Energy Package Governance Regulation are considered. This states that Member countries must set a trajectory for their total 2030 share of energy from renewable sources at 18%, 43% and 65% in 2022, 2025, 2027 respectively.

There is a strong policy signal that renewable energy ambition levels will continue to increase over the course of the decade, as evidenced by the recent increase in our national target from 70% to 80% late last year, and that onshore wind energy will continue to have the vital leading role that it has in the CAP 2021. Furthermore, in early March 2022 the European Commission made an announcement

¹ <https://www.gov.ie/en/publication/0015c-irelands-national-energy-climate-plan-2021-2030>

addressing energy security issues emerging from Russia’s invasion of Ukraine². It revealed that the EU intends to drastically accelerate its transition to clean energy thereby increasing Europe’s energy independence and “will publish a recommendation on fast permitting for renewable energy projects and will work to support the use of all flexibilities already granted by EU legislation and the removal of remaining obstacles, whatever their origin” (page 9). In addition, Member States will be required to swiftly map, assess and ensure suitable land and sea areas are available for renewable energy projects, commensurate with their national energy and climate plans.

It is wholly apparent from national and EU policies, and based on current trajectories, that onshore wind is a critical form of infrastructure which is essential to address our climate and energy security crises.

Material Amendments Observations: CH11, CH11.2, CH11.5 & CH11.9

We note that the planning authority has committed to reviewing the Renewable Energy Strategy 2011-2021 within one year of adoption of the Plan in the proposed material amendments. We also note the proposed new objective REO22 – “To support and facilitate the achievement of the minimum renewable energy target of 600MW for County Mayo over the plan, and to review/revise this target to ensure consistency with any future renewable energy strategies for the Northern and Western Region”.

We recognize that the current RES is a formative and well construed strategy that has proved effective over time and that it set a credible minimum target. It is equally credible in our view that there could be an additional 600MW in the next development plan period.

Importantly we recognize that the strategy complies with the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, (Dept. of Housing, Planning, Community and Local Government) July 2017*, as, amongst other things it indicates that the onshore wind energy potential of the strategy (RES Table 1 – Existing and Theoretical Potential Renewable Energy in Co. Mayo). This onshore target was set some time ago, however, but based on this being a minimum target, which is reinforced in the new objective, we believe the current RES can continue to facilitate onshore wind successfully in the County until the adoption of a new policy.

Community and Economic Development

As the Council is aware, the Energy Sector is a key sector for job growth throughout the lifetime of the Draft Plan. Wind energy developments can generate significant construction and operation jobs throughout its lifetime and significantly contribute to rural regeneration through the provision of local community benefit funds and local authority rates contributions.

In relation to communities, FuturEnergy Ireland 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 places greatest focus on the residents of dwellings within 2km of any development area and recognises the need to ensure people located further away from the development are informed as details become more defined.

² Communication from the Commission to the European Parliament to the European Council, the Council, The European Economic and Social Committee and the Committee of the Regions, REPowerEU: Joint European Action for more affordable, secure and sustainable energy. [Strasbourg, 8.3.2022 COM(2022) 108 final]

FuturEnergy Ireland is also committed to ensuring that local communities benefit from having a wind farm in their locality in terms of a Community Benefit Fund that supports the development of local recreation amenities and provides additional community project funding. Community benefit schemes relating to RESS projects will have significant community benefit and provide an opportunity to transform rural communities where projects are located. A good example includes recreational facilities at Sliabh Bawn Wind Farm in Co. Roscommon (www.sliabhawnwindfarm.ie).

The Public Consultation on Good Practice Principles for Community Benefit Funds³, under the third Renewable Energy Support Scheme (RESS3) published 30th March 2021, provided welcome guidance on Community Benefit Fund administration, structure and quantity, indicating that a 50MW project will provide approximately €300,000 to the local community annually.

FuturEnergy Ireland is an active member of the Wind Energy Ireland (WEI, formerly IWEA) and our team members actively participate in several of the Association's committees and the Board of the organisation. 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 plus operational lifespan of wind farms take the form of rents payable to landowners, financial support for local communities in the form of community benefit schemes and commercial rates payable to local authorities. Combined, these amount to approximately €25,000 per MW per annum.

We are also working hard around Community Investment and examining how communities could be given the opportunity to invest in a wind farm project.

In summary, FuturEnergy Ireland believes that wind energy is of strategic importance to the county in addressing climate change, growing the Mayo 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 substantial and requires considerable collaboration between all parties involved or associated with renewable energy including the communities that will ultimately host the infrastructure. FEI has an experienced team in wind farm planning and development and is available to work in partnership with Mayo County Council to support the realisation of the Climate Action Plan targets.

Conclusion

It is critical that we increase our renewable energy fleet and remove fossil fuels from our society. Onshore wind is critical to meeting targets in our Climate Action Plan 2021 as well as our interim national targets between now and 2030.

We thank you for the opportunity to provide feedback on the material amendments through the current consultation process. We would be happy to participate in any further engagement on this matter, including to discuss any aspect of our response, or to clarify any matters arising, should that be of assistance.

³ 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/> 12 | Page

Yours sincerely,

[sent by email]

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