

# PUBLIC CONSULTATION ON MATERIAL AMENDMENTS TO THE MAYO DRAFT COUNTY DEVELOPMENT PLAN

## SSE Consultation Response

April 2022

## Introduction

As one of Ireland's leading energy producers, and the largest developer of renewable energy on the island of Ireland, SSE's vision is to be a leading energy provider in a low-carbon world, building a better world of energy for the future. We have worked hard to identify and work towards a transition away from carbon heavy forms of energy production and welcome moves to create a renewables-friendly policy environment at local, regional, national, and European level.

City and County Development Plans are a critical part of that. As the key guiding document for development within Mayo County boundaries over the coming decade, the proposed Mayo County Development Plan will set the tone for development in the county during the critical decade leading to the climate action milestone of 2030.

As acknowledged in the Draft CDP, Mayo has the potential to contribute significantly towards the realisation of Ireland's transition towards decarbonisation. SSE welcomes the ambition shown in the CDP to ensure that the county fulfils its potential by contributing to the sustainable delivery of a diverse and secure energy supply and to harness the potential of the county to assist in meeting renewable energy targets.

## About SSE

Since entering the Irish energy market in 2008, we have invested significantly in our Irish businesses, with a total economic contribution of €3.8bn to Ireland's economy over the past five years. We own and operate 890MW of onshore wind capacity across the island, 15% of the total installed wind energy capacity of the island of Ireland (n=5585MW). Our portfolio includes sites across both Northern Ireland and the Republic of Ireland, including Ireland's largest onshore wind farm, the 174MW Galway Wind Park (jointly developed with Coillte).

SSE is also the leading developer of offshore wind energy in Great Britain, with this technology having the potential to transform Ireland's response to climate change. We are currently developing an offshore windfarm off the coast of Co. Wicklow – Arklow Bank Wind Park Phase 2, and plan to progress offshore wind projects in Co. Louth at Braymore Point and in the Celtic Sea.

With a focus on contributing all we can to the transition towards Net Zero by 2050, SSE welcomes the chance to contribute to the final phase of the CDP development process and we would be happy to discuss any aspect of this submission, our work in the field of renewables innovation and delivery and energy supply, or any other relevant matter.

## Executive Summary

### **CH 1.1, Section 1.4, UN Sustainable Development Goals (pg.14)**

SSE welcomes this amendment. It is positive to see the inclusion of an express commitment to ensure efficient and sustainable use of all natural resources to bring about a healthy society and clean environment where no net contribution to biodiversity loss arises from such development.

### **CH 1.2, Section 1.5, Climate Action (pg.15)**

SSE welcomes this amendment. It is important that the significant and ambitious commitments made at EU level to address the climate crisis are acknowledged in the CDP to ensure that these overarching goals are afforded their due significance in decision-making on planning and development within the county.

### **CH 7.1, Section 7.1, Strategic Aim (pg.131)**

SSE welcomes this amendment. It is positive to see the inclusion of an express commitment to 'facilitate the transition to a low carbon and climate resilient society' within this vital chapter of the CDP. It is, however, vital that it is underpinned by specific and sufficiently ambitious actions such as grid infrastructure development to ensure this high-level goal remains achievable.

### **CH 10.1, Section 10.3, National & Regional Position (pg.179)**

SSE welcomes this amendment. The acknowledgement that the environment and our health and wellbeing are inextricably linked is important to promoting the aims of sustainability and balanced development. To achieve this balance, SSE would recommend that every effort be made to ensure viable renewable energy development sites are considered on their own merits to ensure a solutions-focused, presumption in favour approach can be taken wherever appropriate, subject, of course, to the principles of proper planning and sustainable development.

### **CH 11.2, 11.5 & 11.6, Sections 11.7.5 & 11.7.12, Mayo Renewable Energy Strategy (pg.212 & 216)**

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 will allow the council to consider critical issues such as the impact of new national and EU policies in this area, such as the impact of the setback distances set out in the Draft Wind Energy Guidelines (2019) on designated strategic wind development areas in the county.

### **CH 11.9, Section 11.7.12, Renewable Energy Objectives (pg.217)**

SSE welcomes this amendment. SSE strongly welcomes the increase of this target from the 100MW minimum specified in the Draft CDP to 600MW, which better reflects the county's potential as a producer of renewable energy. As it currently stands, we consider it quite probable that the new 600MW target could be achieved in the earlier years of the CDP's period of applicability given the range of wind farm proposals in development for the county. It is therefore important that reaching this target continues to be seen as the very basic threshold of acceptable renewable energy production for the lifetime of the CDP rather than an aspirational goal.

## Comments on Proposed Amendments

### Chapter 1

#### CH 1.1, Section 1.4, UN Sustainable Development Goals (pg.14)

*'Insert the following text in Section 1.4 of Chapter 1 of the draft plan:*

... RPO 5.5 of the RSES expands on the concept the sustainable use of natural assets by seeking to: Ensure efficient and sustainable use of all our natural resources, including inland waterways, peatlands, and forests in a manner which ensures a healthy society a clean environment and there is no net contribution to biodiversity loss arising from development supported in this strategy. Conserve and protect designated areas and natural heritage areas. Conserve and protect European sites and their integrity.'

**SSE welcomes this amendment.** It is positive to see the inclusion of an express commitment to ensure efficient and sustainable use of all natural resources to bring about a healthy society and clean environment where no net contribution to biodiversity loss arises from such development. It is vital that we use all available resources to aid the transition to decarbonization, this includes making full use of suitable sites for the development of renewables through uses such as onshore and offshore wind, solar, and green hydrogen.

#### CH 1.2, Section 1.5, Climate Action (pg.15)

*'Amend Section 1.5 to include the following details on the European Green Deal:*

*[insert the following text]* Tackling climate change is a top priority for the EU and the European Commission has presented a package of measures designed to make Europe the world's first climate-neutral continent by 2050. The European Green Deal includes key policies aimed at ambitiously cutting emissions, preserving Europe's natural environment and investing in cutting-edge research and innovation. It sets out an achievable roadmap that will ensure the EU's economy becomes sustainable by turning climate and environmental challenges into opportunities across all policy areas that will result in economic growth and jobs. Furthermore, the National Climate Action Plan (2019) sets out a course of action to address the impacts of climate change on Ireland's environment, society, economic and natural resources.'

**SSE welcomes this amendment.** It is important that the significant and ambitious commitments made at EU level to address the climate crisis are acknowledged in the CDP to ensure that these overarching goals are afforded their due significance in decision-making on planning and development within the county. Adding an express acknowledgement of these European-level actions provides a vital touchstone within the CDP to aid the development of projects aimed at achieving the ambition of NetZero by 2050.

## Chapter 7

### CH 7.1, Section 7.1, Strategic Aim (pg.131)

*'Amend Strategic Aim 7.1 as follows:*

*[Insert the following text] ... and facilitate the transition to a low carbon and climate resilient society.'*

**SSE welcomes this amendment.** It is positive to see the inclusion of an express commitment to 'facilitate the transition to a low carbon and climate resilient society' within this vital chapter of the CDP. It is particularly important that this guidance is brought to bear in the approach to developing the county and region's electricity grid infrastructure. This is key to realising Mayo's significant renewables energy generation potential.

The existing transmission network within the region is predominantly 110 kV with very little higher capacity 220 kV and 400 kV transmission infrastructure. While EirGrid's Shaping our Electricity Future ('SoEF') aims to develop a transmission network designed to manage 80% of Ireland's electricity coming from renewable sources by 2030, this policy, in its current form, is unlikely to assist in removing existing limitations on exporting RES-E from Mayo. To help achieve the stated aim of a transition to a low carbon and climate resilient community the Mayo County Council must adopt an ambitious approach to grid development that is commensurate with the county's ambition for renewable projects and a transition to decarbonisation.

Future improvements to the regional transmission network will be a significant facilitator in both 'unlocking' previously constrained sites within the region and maximising the output capacity of existing strategic assets, which will consequently raise the renewable energy generation potential of North and Western Regional counties. It is, therefore, vital that the aim of facilitating the transition to a low carbon climate resilient society translates into the development of the county's grid infrastructure.

## Chapter 10

### CH 10.1, Section 10.3, National & Regional Position (pg.179)

*'Amend Section 10.3 to read as follows:*

[Insert the following text] ... The environment and our health and wellbeing are inextricably linked, and we need to look beyond simply protecting people from threats in their environment to considering how the environment can deliver a much wider range of social, economic and environmental benefits whilst ensuring no net contribution to biodiversity loss.'

**SSE welcomes this amendment.** The acknowledgement that the environment and our health and wellbeing are inextricably linked is important to promoting the aims of sustainability and balanced development. In Ireland, we are fortunate to have a wealth of natural resources at our disposal. Our potential for increased and broadened harnessing these resources for renewable energy development is of key importance as we transition away from carbon heavy activities to a greater reliance on renewable and clean energy solutions. To achieve this, it is vital that our environmental potential is actively reviewed, and a solutions-focused approach taken to harnessing it.

This is even more pressing as we strive for a doubling of Ireland's onshore wind capacity to 8.2GW to achieve our 2030 climate targets. With the more easily identified sites for wind energy infrastructure across the country having now broadly been developed, it falls to developers, central government, and local and regional authorities to find solutions to the challenge of identifying new sites for development.

As stated in SSE's original submission on the Draft Mayo CDP, the necessity of balancing the development of additional renewable energy resources with protecting the value and amenity of the natural environment will, and must, continue to be prioritised. Bespoke solutions will be needed to identify strategic wind energy sites, project design, and operation parameters. It is also vital that every effort is made to ensure that viable sites are considered on their own merits to ensure a solutions-focused, presumption in favour approach can be taken wherever appropriate, subject, of course, to the principles of proper planning and sustainable development. These will be vital parts of realising the aspirations of the proposed amendment to this section.

## Chapter 11

### CH 11.2, 11.5 & 11.6, Sections 11.7.5 & 11.7.12, Mayo Renewable Energy Strategy (pg.212 & 216)

Amend the Section 11.7.5 to read as follows:

... Mayo County Council will commence the review and update the Mayo Renewable Energy Strategy within one year of adopting this plan.

**Amend REO 7 as follows:**

REO 7 To commence the review of the Mayo County Renewable Energy Strategy 2011-2022 within one year of adopting this plan and update as required in accordance with future legislative guidelines and consistency with the provisions of RPO 4.16 and RPO 5.2(b) of the RSES, 2020-2032.

**Amend REO 8 as follows:**

REO 8: To encourage the development of wind energy, in accordance with Government policy, and having regard to the Landscape Appraisal of County Mayo and the Wind Energy Development Guidelines (2006) and Mayo Renewable Energy Strategy, or any revisions thereof or future guidelines., and ensure consistency with the provisions of RPO 4.16 and RPO 5.2(b) of the RSES (2020-2032).

**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.

#### CH 11.9, Section 11.7.12, Renewable Energy Objectives (pg.217)

Include new objective after REO 22 to read as follows:

REO: 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.

**SSE welcomes this amendment.** Mayo's wind energy potential is well documented as a key strength in regional and local development strategies. SSE strongly welcomes the increase of this target from the 100MW minimum specified in the Draft CDP to 600MW, which better reflects the county's potential as a producer of renewable energy. It is also very welcome that the 600MW target is specified as 'the minimum' to be achieved. As it currently stands, SSE views it as quite probable that this 600MW target could be achieved in the earlier years of the CDP's period of applicability given the range of wind farm proposals in development for the county. It is therefore important that reaching this target continues to be seen as the very basic threshold of acceptable renewable energy production for the lifetime of the CDP rather than an aspirational goal given the ever-greater efficiencies resulting from continued improvements in renewable energy generation technologies.

The continuing evolution of renewable energy technology, particularly wind energy infrastructure, has meant that modern commercial turbines can now be installed in fewer numbers, albeit more spaced out, due to improved technological efficiencies in generating wind energy while also minimising environmental impacts. For example, two Strategic Infrastructural Development scale wind farms would easily generate and exceed the proposed 100MW target. Those turbines currently on the market can have a generating capacity above 5MW with most new turbines currently providing capacity within the 5 – 7MW range.

Eliminating current barriers to more efficient generation and transmission of renewable generated electricity, e.g., constraints on the transmission network, in combination with on-going technological advances will ultimately raise the hypothetical ceiling for wind-generated electricity generation even further.

Therefore, it is important that the CDP accounts for that and incorporates a sufficient level of ambition to promote the achievement of the county's full potential as a leading producer of wind energy into the future.

As set out within the context of our response on page 5 above to proposed amendment *CH 7.1, Section 7.1, Strategic Aim (pg. 131)*, network development could help to further unlock renewables potential across the county should a sufficiently ambitious approach be taken to grid development at local, regional and national level.

With such positive indicators of Mayo's potential to significantly increase its renewable energy output, it is positive to see the local authority adopt a more ambitious stance than set out in the original draft CDP. SSE therefore welcomes this amendment, particularly its acknowledgement that this target is to be seen as a *minimum* threshold to be reached rather than a top-level target to be aspired to.

## Conclusion

The most recent IPCC Report has made for sobering reading. There is now clear evidence of 'irreversible impacts' in natural and human systems caused by human-led climate change. (IPCC, 2022, p. 11) Combined with the increasing volatility of fuel markets and challenges relating to security of supply, the urgency of our transition to renewables has never been more apparent.

As Ireland realigns its focus to reduce dependency on fossil fuels, decarbonise, and reach net-zero greenhouse gas emissions by 2050, the new County Development Plan provides a unique opportunity to consider the role and potential of Mayo in supporting overarching national goals and objectives. The coming decade will be critical in setting down the foundations of our broad ranging, long-term transition to a cleaner and more sustainable way of living and working. It has therefore never been more important to get planning policy right.

The foundations must be set down in this CDP to realise the county's potential as a key producer of renewable energy the region and Ireland as a whole. SSE welcomes this final phase of the CDP development process and urges Mayo County Council to continue driving forward its efforts to facilitate, promote, and develop its renewables potential now and into the future.

SSE would be happy to discuss any aspect of this submission, our work in the field of renewables innovation and delivery and energy supply, or any other relevant matter.