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Dear Sir/Madam,

Re: Proposed Amendments to Carlow Draft County Development Plan 2022-2028, Material Amendments No. 51

Wind energy Ireland (WEI) welcomes the opportunity to make this submission on the Material Amendments to the draft Carlow County Development Plan 2022-2028. WEI have concerns with the above Draft Plan including the Proposed Material Amendments (Proposed Plan) in relation to wind energy.

Wind Energy Ireland (WEI) is the representative body for the Irish wind industry, working to promote wind energy as an essential, economical, and environmentally friendly part of the country's low-carbon energy future. We are Ireland's largest renewable energy organisation with more than 170 members who have come together to plan, build, operate and support the development of the country's chief renewable energy resource.

Firstly, WEI supports in part **Amendment 51** of the Proposed Plan. They relate to additional text in Section 7.10.1 on 'Renewable Energy':

*"The potential for each renewable energy type in Carlow is dependent on the abundance of the natural resource available, along with environmental and infrastructural constraints and facilitators. The scale of developments can range from micro to large-scale, providing energy for a single dwelling, a commercial property, or being exported to the electricity grid for distribution. **Renewable energy***

technologies can also be successfully co-located, or located alongside installations for energy storage, conversion, and grid stability. This approach can help enable greater penetration of renewable energy on the national grid, as well as integration of renewable electricity with transport and the gas grid. Renewable energy development decreases reliance on fossil fuels and imports, reducing greenhouse gas emissions and improving security of supply. (Material Alterations Carlow Draft CDP, pp 26)

The use of energy storage is critical for the future security, reliability and operation of Ireland's power system. Energy storage technologies are a key enabler to a decarbonise electricity system, and their deployment supports renewable energy policy objectives by providing a multitude of valuable services. For this reason, WEI supports the addition of this text relating to co-location of energy storage solutions and renewables.

In previous consultations WEI has stated our concerns in relation to the Carlow's Proposed Plan. WEI believe that it does not adequately support the development of onshore wind developments and fails to implement national policy. One area of great concern to our members is related to policy WE.P4. This policy notes that wind farm development will not normally be permissible in 'Uplands' in the county (not including micro generation and community projects). The wind opportunity mapping exercise mostly highlighted potential areas for wind development within these no go 'Upland' areas (see Figure 1). WEI believe that maintaining this position within the Proposed Plan is a regressive action for Carlow County Council.

WEI note Carlow's desires to increase their solar energy output and we support any increase in renewable energy development across the country. However, this aspiration to develop solar energy should not disadvantage the potential development of wind energy in the county. National policy found within 'Climate Action Plan 2021' states that a balance of technology solutions is required to meet our national targets. Thus, WEI believe that the Proposed Plan is contrary to obligations of the Council under the recent Climate Action and Low Carbon Development (Amendment) Act 2021, Section 17. It states:

(1) A relevant body shall, in so far as practicable, perform its functions in a manner consistent with
(a) the most recent approved climate action plan,

- (b) the most recent approved national long term climate action strategy,*
- (c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*
- (d) the furtherance of the national climate objective, and*
- (e) the objective of mitigation greenhouse gas emissions and adapting to the effects of climate change in the State.”*

If Ireland is to reach its 2030 targets of doubling the installed capacity of onshore wind within the decade all counties must work together toward our national targets. WEI would respectfully ask Carlow County Council to reconsider their current onshore wind policy positions prior to adopting the Proposed Plan.

Conclusion

Since Carlow’s last public consultation on the Proposed Plan there has been a notable shift in national/global dialogue on the need for renewable energy. The invasion of Ukraine by the Russian Federation has caused the European Union and Irish Government to double down on our transition to renewable energy. They have both stated how essential it is for Ireland to drastically increase its supply of native renewable energy sources. Onshore wind will help supply Ireland with that renewable energy generation needed to wean off Russian fossil fuels. The increase in renewables has always been required to ward off the impacts of climate change but Ireland now has yet another reason to turn to wind energy.

In the view of WEI, the repercussions of the concerns identified above will serve to significantly undermine the potential capacity and ultimate contribution of the Proposed Plan to meeting national onshore renewable energy targets under the Climate Action Plan 2021. WEI thank Carlow County Council for the opportunity to engage on these matters and welcome any clarifications that may arise.

Yours sincerely,

[email submission]



Denis Devane
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APPENDIX:

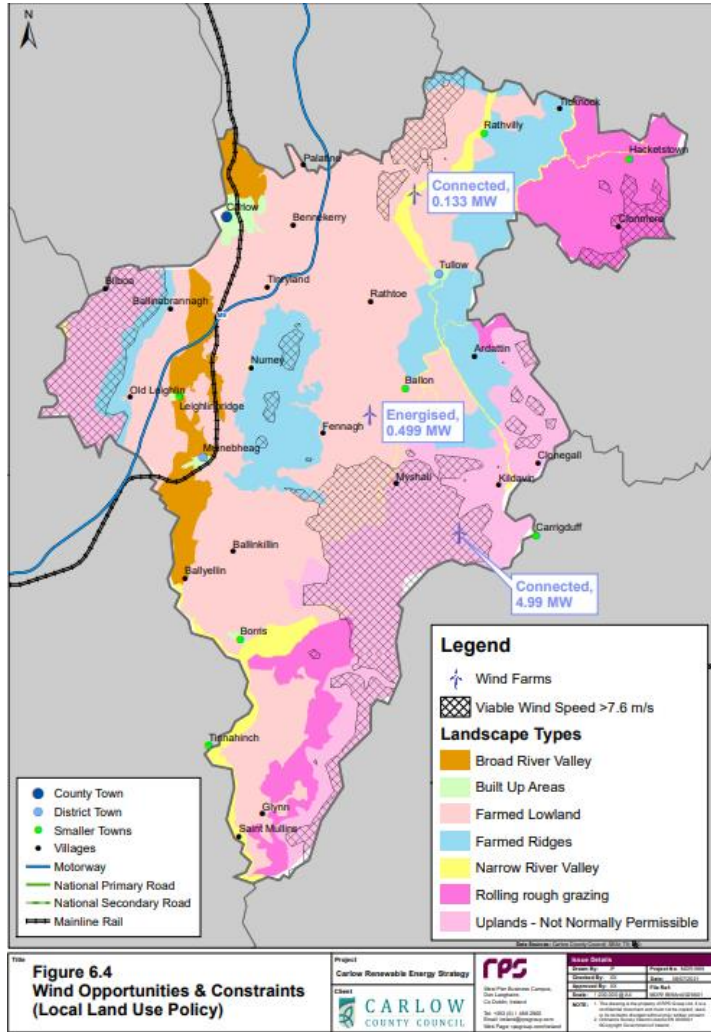


Figure 1: Wind Opportunities and Constraints

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