OFFALY COUNTY COUNCIL

SSE RESPONSE TO

Public consultation on Offaly Draft County Development Plan

OCTOBER 2020

About SSE

At SSE we're proud to make a difference. From small beginnings we've grown to become Ireland's second largest energy provider, supplying green electricity and natural gas to over 700,000 homes and businesses on the island. We are driven by our purpose: to provide energy needed today while building a better world of energy for tomorrow.

Since entering the Irish energy market in 2008 we have invested significantly to grow our business here, 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. Our portfolio includes Ireland's largest onshore wind farm, the 174MW Galway Wind Park, which was jointly developed with Coillte. In County Offaly, we have plans to develop Yellow River Wind Farm near Rhode Village. We also own and operate a thermal power station in the area.

As a leading developer of offshore wind energy in Great Britain, we believe offshore renewable energy has the potential to transform Ireland's response to climate change. SSE is currently progressing the development of a consented offshore windfarm off the coast of Co. Wicklow - Arklow Bank Wind Park Phase 2. We also have plans to progress projects at Braymore Point and in the Celtic Sea.

Introduction

SSE wishes to make this submission for consideration as part of the *Draft Offaly County Development Plan* consultation. SSE welcomes the publication of this draft and supports the central role that County Development Plans will play in implementing the National Planning Framework (NPF).

SSE welcomes the recognition given to climate action in the Offaly draft CDP. While, tackling the Covid-19 pandemic will continue to be our national priority for some time, the climate emergency has not gone away. Delivering on the commitments of Ireland's Climate Action Plan and ensuring we are able to meet our Paris Agreement obligations are critical priorities. As we seek to move beyond the Covid-19 crisis, there is a need to ensure our economy is cleaner and more resilient. Investing in a green recovery has the potential to create thousands of sustainable jobs in County Offaly. Ensuring a just transition is also critical as emphasised by policy CAEP-21.

We particularly welcome policies CAEP-04 to CAEP-12 which seek to support European and National climate objectives; raise awareness of issues associated with climate action and; support the transition to a low carbon economy by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency.

We would like to highlight the following areas for consideration.

Renewable electricity – onshore wind

a) Role of onshore wind in Ireland

With over 4,000MW installed, onshore wind is an Irish success story and an area of climate action where, as a country, we can claim to be a world leader. The SEAI Energy in Ireland 2019 report confirmed that in 2018 alone, wind energy avoided 3.15 million tonnes of CO2 and cut our fossil fuel import bill by €432 million[1]. The benefits of onshore wind go beyond climate action. Wind energy

[1] SEAI Energy in Ireland report 2019: https://www.seai.ie/publications/Energy-in-Ireland-2019-.pdf

generates economic benefits during construction and throughout the operational life of the development through rents payable to landowners, community benefit schemes, job creation and commercial rates payable to Local Authorities. For example, the construction of Galway Wind Park is estimated as supporting 1,657 years of full-time employment in Ireland and contributing over €88.7m to the economy. €20million was spent with local suppliers during the construction phase of the project[2].

We welcome CAEP-23 and CAEP-24 which seek to ensure renewable energy projects are subject to appropriate community consultation and that community benefits are derived. We strongly believe in playing our part by contributing to the social, environmental and economic well-being of communities surrounding our projects. To date, the SSE Airtricity Community Benefit Fund has allocated over €6.5m to community projects close to our wind farms. The multi-million-euro Galway Wind Park Community Fund comprises a Scholarship Fund, a Major Projects Fund and an annual Community Benefit fund to which local community groups can apply. Over €700,000 has been awarded since the project became operational in April 2019.

We look forward to developing Yellow River wind farm in County Offaly in the coming years and working with the local community to ensure the wind farm leaves a lasting socio-economic legacy. Yellow River is a consented wind farm close to Rhode Village. Commencement will depend on when the 100MW project is able to secure a route to market but we hope that will be in 2021. As we prepare to move the project forward, our focus is on building strong relationships within the local community in which Yellow River Wind Farm is hosted. As a responsible developer and operator, we look forward to working closely with the community in Rhode and North Offaly to fully realise the benefits of this project.

b) Ensuring consistency with national policy

The Climate Action Plan commits to reaching 70% renewable electricity by 2030 through doubling Ireland's onshore wind capacity to 8GW and installing at least 3.5GW of offshore wind. The recently agreed Programme for Government has increased this offshore wind target to 5GW. To put the scale of this welcome ambition into context it should be noted that it has taken 20+ years to achieve the current level of renewable generation. The challenge is now to achieve more than twice as much in half the time. We recommend that these national targets be reflected in Offaly's County Development Plan. It is critical that onshore wind continues to be recognised, promoted and facilitated in the county.

SSE welcomes the preparation of the Wind Energy Strategy for County Offaly. We would encourage the Council to ensure this strategy is consistent with the Wind Energy Development Guidelines. The consistent implementation of the Wind Energy Development Guidelines – a key piece of national policy currently under review - is of crucial importance to ensure the development of onshore wind in the county is not unnecessarily restricted. As a responsible developer, SSE is committed to best practice in developing our projects. The clear and consistent applications of standards enables us to progress projects with confidence; unclear standards discourage investment.

SSE would like to highlight that turbine technologies have advanced significantly in the past decade and this trend is set to continue. For this reason, we suggest the SEAI Wind Atlas, or any similar general wind resource data, is not used as a constraint when identifying suitable areas for onshore wind in Offaly's Wind Energy Strategy.

[2] Galway Wind Park Sustainability Impact Report: https://www.sserenewables.com/media/ggxao1fx/galway-wind-park_sustainability-impact-report_web.pdf

Developments in wind turbine technology are also relevant to the issuing of planning permissions. New turbine technologies can operate longer than those initially developed in the 1990s and 2000s. In addition, turbines are often outliving what was initially considered to be their projected lifespans. It is therefore necessary that new consents allow for 30-35 years operation at a minimum so as not to unnecessarily limit the operation of the development.

When preparing this Wind Energy Strategy, we recommend Offaly County Council engage closely with neighbouring local authorities and with other local authorities in the region to ensure a consistent approach. A regional steering group comprising planners from each local authority and potentially led by Offaly planners, would be optimum with input from DHLGH.

c) Repowering

We welcome CAEP-36 which outlines the Council's policy to consider the repowering of existing windfarm developments on a case by case basis where the proposal does not result in a net increase in the number of turbines and it is demonstrated that there is no adverse impact on the receiving environment, landscape, designated sites or residences in the area. Repowering will begin to emerge as a trend during the course of the next decade. Ireland has almost 4000MW of onshore wind generation currently. As highlighted above, wind turbines installed during the 1990s and 2000s were typically designed to operate for 20-25 years though many have been able to exceed this. As turbines near end-of-life, repowering or life extension provide an alternative to decommissioning that can provide a host of benefits. Installing modern technology on these sites can be cheaper than new builds, reduce the number of turbines, result in lower energy costs and prices, and increase our energy security.

Recommendations:

- We recommend the SEAI Wind Atlas, or any similar general wind resource data, is not used as a constraint when identifying suitable areas for onshore wind in Offaly's Wind Energy Strategy.
- The consistent implementation of the Wind Energy Development Guidelines – a key piece of national policy currently under review - is of crucial importance. We would urge the council to not go beyond what is required by the WEDG to ensure compliance with national policy.
- New consents need to allow for 30-35 years operation at a minimum so as not to unnecessarily limit the operation of the development and ensure developers are able to build a strong business case at the outset.

Security of supply

European environmental policies including the Industrial Emissions Directive are necessitating a move away from traditional fossil fuel powered stations. As Ireland's largest renewable energy developer with 29 onshore wind farms in Ireland and plans to develop a large-scale offshore wind farm off the coast of Wicklow, we recognise the importance of growing Ireland's renewable energy share. While an increase in renewables is welcome, flexible, thermal generation which can provide low carbon, efficient baseload power will continue to be required in the medium term to support the decarbonisation and increase security of supply. So far the DS3 programme has enabled EirGrid to increase levels of renewable generation on the system from 50% to 65%. EirGrid's aim is to increase this gradually to 95% over the coming years. Flexible, thermal generation will be needed to enable this, along with technology such as batteries, potentially even co-located with renewable generation.

Recommendation:

- We would encourage Offaly County Council to recognise the importance of security of supply in the County Development Plan and the continued need for flexible, low carbon generation

capacity on the Irish grid. We would also encourage Offaly County Council to recognise the importance of ensuring the continued use, reuse or repowering of existing infrastructure where appropriate to allow Ireland to enable Ireland to meet its energy needs.

Energy efficiency and the electrification of heat

SSE believes that energy efficiency should be seen as an infrastructure priority in Offaly's County Development Plan. Energy efficiency not only helps Ireland achieve its climate action objectives, it also reduces energy bills and improves health and social inclusion. It can also help create jobs and drive a green recovery as emphasised in the Programme for Government. The Climate Action Plan contains ambitious plans to improve energy efficiency and drive the electrification of Ireland's housing stock with 500,000 deep retrofits. SSE believes that energy efficiency in combination with the electrification of heat will lead the way in realising Ireland's decarbonisation potential. We welcome the ambitious plans for heat pump installation in the Climate Action Plan.

A partnership approach and continued collaboration between energy suppliers, the SEAI and local authorities will be vital given the scale of energy savings required in the next decade. We are proud of the work we have undertaken to date and look forward to continuing this as part our 'one-stop-shop' for energy efficiency which we recently launched in partnership with An Post. We recommend Offaly's County Development Plan reflect Action 64 in the Climate Action Plan which seeks to increase the energy efficiency of Local Authority social housing stock. We would encourage the Council to work with SEAI to target local authority housing stock and competitively tender for the delivery of deep retrofit works to ensure high quality and cost-effective outcomes.

Recommendation:

- Energy efficiency should be seen as a priority in Offaly's draft CDP. We recommend Offaly's County Development Plan reflect Action 64 in the Climate Action Plan which seeks to increase the energy efficiency of Local Authority social housing stock.

Electrification of transport

Transport as a sector is the most significant contributor to our national Green House Gas (GHG) emissions. Sustainable transport policies are of particular importance given the predominance of private cars. Given the predominance of the private car, encouraging a modal shift towards public transport and cycling is key alongside the electrification of transport. The Climate Action Plan envisages one million EVs on Ireland's roads by 2030.

We welcome SMAP-02 in Offaly's draft CDP which supports the growth in the use of EVs; prioritises car parking spaces for these vehicles; and seeks to facilitate the provision of charging infrastructure where considered appropriate. The deployment of targeted electric vehicle charging infrastructure across the county will be vital to meet the changing needs of commuters.

Recommendation:

- Spatial planning at a local authority level will be critical to drive the electrification of transport. Offaly's CDP should go further than the policies currently outlined to identify areas where EV charge points could be installed and competitively tender for these assets.

Public lighting and smart technologies

Public lighting infrastructure is also an area which should be considered as part of Offaly's next County Development Plan. We recommend that local authorities strive to achieve 100% conversion to LED lighting to reduce energy consumption. As a public lighting contractor with responsibility for maintaining over 275,000 streetlights on behalf of 15 local authorities across Ireland, we understand the benefits that LED retrofit projects can bring and have experience carrying these out across the county. Upgrading public lighting infrastructure can lead to significant energy savings (30%+), reduced carbon emissions, improved lighting levels and reduced maintenance costs. The upgrades necessary to ensure compliance with safety standards should also be prioritised. Much of the lighting infrastructure across the country has been in place for a significant period of time. We recommend local authorities develop an improvement plan to implement remedial actions and introduce the long-term improvements needed to avoid unnecessary incidents on public light systems.

We believe there are also opportunities for smart city technologies to be utilised in County Offaly to assist in working towards sustainability targets and Climate Action Plan ambition. Smart city technology can assist with energy reduction but also other areas like data collection where assets provide real time data on street lighting energy usage, atmospheric pressure, CO2 emissions and average noise pollution levels. This information can be used to support strategic decision-making. The delivery of this smart environment will help make cities safer for walking home at night, improve reporting on toxic pollutant levels, maximise financial savings, and ultimately achieve a better quality of life for residents.

Smart city technologies can also help integrate public lighting infrastructure with EV charging therefore reducing the amount of street furniture and freeing up more space for walking and cycling. Fingal County Council have become the first council to install smart columns. The Smart Column fulfils its initial function of providing valuable street lighting but also has a built-in technology in the column door to allow Electric Vehicles to plug in and charge whilst parked on the street. SSE Airtricity Utility Solutions worked with Fingal County Council to implement these changes in a safe and timely manner. We recommend Offaly County Council implement similar technologies and innovations.

Conclusion

The Offaly County Development Plan is an opportunity to define the focus of future investments in the County and to ensure that employment opportunities and the services needed to support them will be delivered. The implementation of Project Ireland 2040 and the Climate Action Plan can deliver a long-term strategic planning and economic framework for the development of the County.

SSE is available to discuss any aspect of our response if that would be helpful to Offaly County Council.