



07 October 2020

Email: ciara.conboy@rwe.com

Ref: Submission on 2nd Draft Offaly County Development Plan 2021 - 2027

To whom this may concern

RWE are pleased to have the opportunity to have our consultation response submission considered in respect of the above in advance of preparation of the 2nd Draft Offaly County Development Plan 2021 - 2027.

RWE Renewables Ireland is operating and developing a number of renewable projects in Ireland, across a range of renewable energy technologies including onshore wind, offshore wind and battery storage. RWE is now one of the world's leading producers of renewable energy: RWE now stands as the world's second largest offshore wind developer and third largest provider of renewable electricity across Europe.

RWE have contributed to the feedback, comments and recommendations outlined in the Irish Wind Energy Association (IWEA) submission to this consultation process and fully support the submission made. RWE have reviewed the various sections of the Draft Offaly County Development Plan 2021 - 2027 and associated documents and make this submission with a particular focus on the designation areas laid out in the draft plan.

If you have any questions regarding our response, please do not hesitate to contact me.

We look forward to engaging in the next stages of this consultation process.

Yours faithfully

Ciara Conboy-Fischer

*online submission bears no signature

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Extent of Wind Energy Strategy Designations

RWE note that the lands designated in the draft WES do not vary hugely from the current WES (2014) and there are still only two classifications being proposed in the draft, 'open to consideration' and 'areas not deemed suitable' for the entire county.

RWE would encourage Offaly County Council to review these designations excluding specific physical constraints used in the current draft analysis, including access to grid and adequate wind speeds. Developers will be able to identify lands more accurately

Distances from Towns and Villages

RWE note CAEP 35 item (c) of chapter 3 Climate Action and Energy, "require a 2 km separation distance from turbines to town and village settlement boundaries in the county". RWE recommend this is removed as a constraint for development of wind farms in addition to the regulations as set out in the Wind Energy Guidelines (2006) and Draft Wind Energy Development Guidelines (2019). Consultation with the local community will be carried out as part of a robust planning application for any proposed wind energy projects where the design of a project will be informed by site specific factors. RWE feel that imposing an additional extended buffer around town boundaries is restricting potentially viable lands unnecessarily.

I-LOFAR submission

RWE note the submission made to Offaly County Council 27th September 2019 by the Irish Low Frequency Array (I-LOFAR) Consortium in relation to the telescope located in Birr castle. This submission proposes two coordination zones that would impose planning restrictions on wind developments near the I-LOFAR telescope. It was proposed that a Protected Zone of 5km radius and Consultation Zone of 10km radius being implemented where certain planning restrictions and specifically a prohibition on wind developments be imposed.

RWE would recommend that Offaly County Council do not impose additional wind energy development restrictions in the proposed Protected Zone and allow any potential developer to engage with I-LOFAR to ascertain whether a potential project is viable. RWE would urge Offaly not to prohibit wind energy development within the Protected Zone and rather keep it open for consultation should Offaly County Council adopt this proposal.