



GALWAY COUNTY COUNCIL

SSE RESPONSE TO

Public consultation on Galway County Development Plan – Issues Paper

SEPTEMBER 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 and are a leading developer of offshore wind energy projects in Irish waters. Our portfolio includes Ireland's largest onshore wind farm, the 174MW Galway Wind Park, which was jointly developed with Coillte. We also have plans to bring forward new projects in County Galway over the next decade to contribute to Ireland's 70% renewable electricity target.

As a leading developer and operator of offshore wind energy in Great Britain, we believe offshore renewable energy has the potential to transform Ireland's ability to respond 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 *Galway County Development Plan – Issue Paper* consultation. SSE welcomes the publication of this Issues Paper and supports the central role that County Development Plans will play in implementing the National Planning Framework (NPF).

SSE welcomes the priority given to climate action in the Northern and Western Regional Assembly Regional Spatial and Economic Strategy (RSES) and the Regional Strategic Outcomes described therein. We welcome the Northern and Western Regional Assembly's (NWRA) identification of climate action as a key principle underpinning the region's RSES. We also welcome the recognition given to climate action in the Galway CDP Issues Paper. 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 Galway.

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 million¹. 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 wind farm 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 Irish economy. €20million was spent with local suppliers during the construction phase of the project².

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 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 to carry out projects with a focus on energy efficiency, sustainability, climate action and safety. Over €700,000 has been awarded since the Galway Wind Park became operational in April 2019.

We recommend Galway County Council adopt policies in support of the continued development of onshore wind in its County Development Plan in support of national policy.

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 Galway's County Development Plan. It is critical that onshore wind continues to be recognised, promoted and facilitated.

As acknowledged in the NWRA RSES, the development of the Wind Energy Guidelines will facilitate informed decision making in relation to renewable energy infrastructure. The consistent implementation of the Wind Energy Development Guidelines – a key piece of national policy currently under review - is of crucial importance. 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.

c) Renewable Energy Strategy

To guide the sustainable development of onshore wind in the county, an updated Renewable Energy Strategy will be needed for County Galway. The approach to wind energy will need to be covered in detail in the strategy to ensure compliance with Specific Planning Policy Requirement (SPPR) 1 in the draft Wind Energy Guidelines 2019 which stipulates that Development Plans should identify on maps areas "*where there is significant wind energy potential and where... Wind energy developments will be acceptable in principle... open to consideration... generally discouraged.*" SSE welcomes Galway County Council's intention to use the SEAI Methodology for Local Authority Renewable Energy Strategies (LARES) when preparing this strategy. We would also stress the importance of ensuring Galway's RES is consistent with the Wind Energy Development Guidelines as highlighted above.

² Galway Wind Park Sustainability Impact Report: <https://www.sserenewables.com/media/ggxao1fx/galway-wind-park-sustainability-impact-report-web.pdf>

When preparing the Renewable Energy Strategy, we recommend Galway 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 Galway planners, would be optimum with input from DHLGH.

In developing the RES, it should also be noted 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 on-shore wind. In addition, we recommend that existing grid constraints are not considered hard constraints when preparing RESs. Grid capacity is a technical and electrical engineering constraint that is managed by the TSO/DSO and new infrastructure is often provided on the basis of there being a need to connect wind energy developments to the electricity grid.

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.

d) Repowering

Repowering will begin to emerge as a trend during the course of the next County Development Plan. 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. We recommend Galway County Council adopt policies in support of repowering and the continued utilisation of infrastructure assets in its CDP.

Renewable electricity - Offshore wind

Offshore wind presents significant opportunities for County Galway post-2030. The Programme for Government contains commitments to produce a longer-term plan setting out how Ireland can harness the potential of c. 30GW of offshore floating wind power in our deeper waters in the Atlantic. The transformative impact of offshore wind is evident in the experience of our nearest neighbour. The UK's offshore renewable industry is fuelling vital investment in the domestic supply chain, building vibrant economies and supporting thousands of skilled jobs. While Ireland is a smaller and less mature market, we believe the potential benefits for Ireland's economic development are significant. According to the SEAI's Wind Energy Roadmap, onshore and offshore wind could create thousands of operation and maintenance jobs by 2040³.

SSE's planned Arklow Bank project (off the coast of County Wicklow) alone will see SSE invest between €1bn and €2bn in a development which could generate around 1.75TWh of renewable electricity annually. In Great Britain it has been estimated that every 1GW of offshore wind capacity installed delivers an economic boost of €2bn to the economy⁴. SSE recommend that Galway's CDP recognises the potential opportunities for the county with regard to offshore wind.

³ SEAI Wind Energy Roadmap 2015: https://www.seai.ie/publications/Wind_Energy_Roadmap_2011-2050.pdf

⁴ ORE Catapult (2017), 'The economic value of offshore wind': <https://ore.catapult.org.uk/app/uploads/2017/12/SP-0012-The->

Energy efficiency and the electrification of heat

SSE believes that energy efficiency should be seen as an infrastructure priority in Galway'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. 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. Meeting our EU obligations and the ambition set out in the Climate Action Plan will require the establishment of a new 'one-stop-shop' delivery model.

SSE believes that energy efficiency in combination with the electrification of heat can lead the way in realising Ireland's decarbonisation potential. We welcome the ambitious plans for heat pump installation in the Climate Action Plan. The on-going decarbonisation of electricity supply and recent innovations in electricity based renewable technologies including air source pumps, make electricity an attractive option as the clean, low carbon energy choice for heating.

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 with Local Authorities to date and look forward to continuing this as part of the 'one-stop-shop' to energy efficiency being developed. We recommend Galway'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.

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. Sixty-six per cent of commuters travelling to work in Ireland use a private car. Given the predominance of the private car, encouraging a modal shift towards public transport and cycling is key alongside the electrification of transport.

We welcome the Climate Action Plan ambition to have one million Electric Vehicles on Ireland's roads by 2030. The deployment of targeted electric vehicle charging infrastructure across the county will be vital to meet the changing needs of commuters with particular emphasis in public parking areas and employment locations. Spatial planning at a local authority level will be critical to drive the electrification of transport. Galway's County Development Plan should 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 Galway'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 Galway 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 Galway County Council implement similar technologies and innovations.

Conclusion

The Galway 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 Galway County Council.