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Re: Draft Kildare County Development Plan 2023-2029 – Consultation Submission

A Chara,

Statkraft Ireland Limited (Statkraft Ireland) welcomes the opportunity to make this submission to Kildare County Council (KCC) regarding the draft Kildare County Development Plan (KCDP) 2023-2029. This submission has been prepared pursuant to the public notice inviting written observations and comments from interested parties.

Statkraft Ireland is part of the Statkraft group. Statkraft is a leading company in hydropower internationally Europe's largest generator of renewable energy. The Group produces hydropower, wind power, solar power, gas-fired power, and supplies district heating. Statkraft is a global company in energy market operations. Statkraft has 3600 employees in 15 countries. As a Norwegian state-owned utility, Statkraft is a solid, dependable partner, committed to playing a leading role in the Irish Energy Market.

Statkraft Ireland develops, owns, and operates renewable production facilities and is also involved in the trading and origination of power from our own projects and those of third parties. Statkraft Ireland's aim is to play a significant role in Ireland's transition to becoming a low carbon economy. Statkraft Ireland employ a highly experienced team, who collectively have over 20 years' experience within the wind energy sector in Ireland and are committed to contributing towards a low carbon future for the Country in line with our 80x30 targets. Statkraft Ireland has a significant pipeline of onshore wind, solar and battery projects as well as an offshore wind projects, and in this context hopes to be able to contribute towards Ireland's 2030 targets through the use of many different technologies.

The updated National Climate Action Plan (CAP) 2021 has set out an ambitious 80% target for renewable energy production out to 2030. To meet this target, the amount of electricity generated from renewables will have to be doubled on current figures. Figure 11.5 (see below) of the CAP illustrate Ireland's projected renewable electricity production requirements to meet the now 80% target. Based on the CAP assumptions, onshore wind will provide a large quantity (over 4GW) of the required electricity yield out to 2030.

Table 11.5 – Potential Metrics to Deliver Further Abatement in Electricity

Key Metrics	KPI 2030		Additional Abatement Impact, MtCO ₂ eq.
Core Measures			
Share of Renewable Electricity, %	Up to 80		6-8
Indicative Onshore Wind Capacity, GW	Up to ~8 *		
Indicative Offshore Wind Capacity, GW	At least ~5 *		
Indicative Solar PV Capacity, GW	~1.5-2.5 *		
Further Measures			
Zero-emission Gas Generation, TWh	1-3		0.2-0.4

* Electricity technologies will compete with each other on cost through competitive auctions

Taking this into consideration, Statkraft Ireland supports KCC’s target (EC T1) to “Support the target in the Climate Action Plan 2019 for a doubling of existing on-shore wind energy from circa 4GW (today) to 8.2GW by 2030”. However, Statkraft Ireland also notes that within Chapter 7 and Appendix 2 of the draft KCDP that KCC considers that doubling the current number of consented onshore wind developments from 53.5MW to 107MW over the lifetime of the CDP adequate in terms of contributing towards our national onshore renewable targets to 2030 within Co. Kildare. As it stands, the number of consented turbines in Co. Kildare represents less than 1.5% of the additional 4.2GW of onshore wind energy required to meet these targets by 2030, a doubling of which is still less than 3%. Given advancements in technology and the increase in output capacity from modern turbines, assuming an average output of 5MW per turbine, this equates to only 21 turbines within the entirety of the County being built over the lifetime of this CDP. Statkraft Ireland urges KCC to remove these pre-determined targets from Chapter 7 and Appendix 2 of the draft KCDP and to take a more ambitious and responsible stance in terms of the potential generation capacity of Co. Kildare over the lifetime of this CDP, whereby developments are granted based on their suitability alone as per draft KCDP Policies EC P2, and EC P4 as well as objective’s EC 011 and EC016 which are in line with National policies and guidelines around the placement of onshore wind taking into consideration all necessary environmental constraints.

Statkraft Ireland wholly welcomes policy EC P2 which is to “Promote renewable energy use and generation at appropriate locations within the built environment and open countryside to meet national objectives towards achieving a net zero carbon economy by 2050” in addition to objective EC O2 to “Adopt an informed and positive approach to renewable energy proposals, having regard to the proper planning and sustainable development of the area, including community, environmental and landscape impacts and impacts on protected or designated heritage areas / structures” and EC 06 to “Encourage developers of proposed large scale renewable energy projects to carry out community consultation (including, but not limited to Sustainable Energy Communities, where established) in accordance with best practice and to commence the consultation at the commencement of project planning”. Statkraft Ireland believes in the plan led development of

onshore wind developments with community consultation an important element of this planning process.

Statkraft also commends KCC on the inclusion of action EC A3 to “*Prepare and implement an overall Renewable Energy Strategy for the County in accordance with the current Climate Change Adaptation Strategy for County Kildare*” as well as the inclusion of the Wind Energy Strategy (WES) in Appendix 2 as part of the draft KCDP. Statkraft believes that the development of a WES by KCC is a really positive step for Co. Kildare and will support the transition to a low carbon society, helping to reduce its’ impacts by facilitating plan led renewable energy development in the County. We also commend KCC for the inclusion of clearly defined and zoned areas for wind development within the County so that there is no ambiguity around the zonation of areas.

Having reviewed the draft WES, Statkraft Ireland notes that KCC have taken into consideration the SEAI Wind Atlas when assessing wind energy potential for the County. As stated previously by Statkraft Ireland, given that turbine technologies have advanced significantly in the past decade, we would recommend to KCC that the SEAI Wind Atlas or any similar general wind resource data not be used as a constraint when developing and zoning areas for renewable energy development. We believe wind resource to be a developer’s constraint, and a variable to be assessed as part of each individual project. Turbine technology has advanced significantly over the past decade, with turbines now capable of harnessing more power at lower wind speeds. These advancements are key to harnessing wind energy in areas which were historically unfeasible as manufacturers are moving almost exclusively to producing larger blades and higher towers meaning developers are not just pushing for higher tip heights and larger blades but for greater efficiency and production based on what is currently and will be available on the market. We urge KCC to remove this constraint within the WES mapping to allow for additional wind energy potential within the County to be considered.

Kildare County Council is one of the few counties in the country with no operating wind farms and while there are 53.5MW of onshore wind projects now consented within Co. Kildare, Statkraft notes that KCC have not to date granted any of these wind farm developments at Local authority level. Both consented wind farms within Co. Kildare are from an Bord Pleanala decisions following appeal after being refused by KCC based on issues that could be either conditioned or dealt with at Further Information stage during the planning process. Statkraft urges KCC to robustly assess projects with a view to granting suitable developments at Local Authority level. This is imperative given the current issues with appeal timelines at An Bord Pleanala level which have been widely publicised in recent months. The average timeline currently associated with decisions for appeals stands at 52 months. A more progressive approach to planning decisions at Local Authority level (akin to other local authorities) is key to Ireland achieving its Climate Action targets and achieving energy security which should be of paramount importance to KCC.

Statkraft Ireland notes that KCC is requesting within the draft WES that the Department of Defence be consulted on all proposed wind farm developments within Co. Kildare as a large portion of the County lies beneath restricted Airspace and Military Operating Areas. Statkraft Ireland would like to highlight that KCC have already refused permission for wind farm developments within Co. Kildare based on aviation concerns raised by the Department of Defence, notwithstanding specialist reports commissioned which highlight these concerns are unjustifiable. Statkraft is of the opinion that

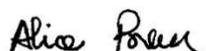
refusing planning permission based on concerns raised which are not evident in any National or European legal or operational aviation requirements is unwarranted.

Embracing the development of all forms of renewable electricity will lead to a better quality of life for the people of Kildare in the decades to come. This is not only through the County delivering effective climate action and tackling the potentially catastrophic effects that we are advised that climate change will have if not addressed, but also in delivering millions of euros to local communities which would assist the people of County Kildare in adopting low carbon solutions and also developing the sustainability of rural living.

Onshore wind developments have an extremely important role to play in the development of any viable and sustainable renewable energy mix and this needs to be supported by KCC. Statkraft Ireland is committed to developing suitable and appropriate renewable energy projects in line with the 2021 CAP. KCC has a responsibility to offer developers every opportunity to bring forward projects that can deliver climate action.

Finally, to accommodate the ambitious target of 80% renewable energy by 2030, the Programme for Government has set a target of 5GW of Offshore Wind to connect to the electricity grid by 2030. Ireland has a significant resource of wind energy generation off its coast. To reach future climate action targets it is imperative that all local, regional, and national authorities support the development of Offshore Wind in Ireland. While Kildare County Council does not govern a coastline, we ask that KCC support Offshore Wind development in Ireland in general and through accommodating grid connections linking offshore wind farms to the national grid system within its administrative area.

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