



Wind Energy Ireland Position Paper on Repowering of Wind Farms

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1 Introduction

Ireland has just over 340 operational wind farms and in 2023 provided 35 per cent of Ireland’s electricity.¹ The onshore wind energy industry also supports more than 5,000 jobs and annually pays more than €51 million in commercial rates to local authorities². We are a country with enormous renewable energy resources and are world leaders at incorporating onshore wind into the national grid.

The need to decarbonise and reduce emissions is critical and in recent years the urgency involved has become clearer right through Government. The most recent and previous CAPs, sets out a roadmap to the delivery on Ireland’s climate ambition.

These align with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022 following the Climate Action and Low Carbon Development (Amendment) Act 2021. The Act commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030, with the electricity sector set an even more ambitious target of 75 per cent.

However, rather than growing in size our electricity system could see a reduction in wind energy generating capacity if repowering or extending existing wind farm projects is not feasible, following expiration of their planning permission for existing wind farms or reaching the end of their functional life. Challenges in repowering or extending the life of existing wind farms may lead wind farm operators to abandon these processes in favour of decommissioning, which would result in a loss of net output. Properly addressing challenges that projects may experience in seeking to repower or extend the lifetime of their planning permission is crucial to harness the full potential of the country’s wind energy resources.

Supportive Government policies and actions which facilitate the efficient repowering and extension of life of existing wind farms is critical to achieving our onshore wind potential and deliver upon our 2030 targets, and beyond to a net-zero 2050.

The following Key Objectives for this position paper are as follows:

- Identify the **key issues** which are the biggest challenges for the repowering and extension of life of existing wind farms.
- Identify a list of **recommendations** that need to be implemented to address the issues that have been identified.

1.1 Definitions

This position paper will focus on repowering and extension of life for wind farms. For the purpose of this position paper, both are defined in **Table 1** below:

Table 1 Key Definitions

Term	Definition
Repowering	The renewing of existing operational wind farms through the full or partial replacement of wind turbines and associated equipment for the purposes of replacing capacity or increasing the efficiency or the capacity of the wind farm.
Extension of life	Extending the permitted lifespan of an existing operational wind farm beyond the period originally granted planning permission, without any changes to the

¹ <https://windenergyireland.com/latest-news/7651-new-record-set-for-wind-power-generation-in-2023>

² Independent research carried out by Eamonn Halpin & Co. LTD – ‘Report on the rateable liabilities of wind farms’ on behalf of WEI (2022).

	installed wind turbines and while keeping the external layout of the wind farm unchanged.
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Both the repowering of, or the extension of life of an existing operational wind farm would constitute development, requiring planning permission under the Planning and Development Act, 2000 (as amended).

2 What is Repowering?

When wind farms reach the end of their design life of well over 30 years, there are three options which are available, these include (1) Decommissioning, (2) Repowering, or (3) Extension of Life. Each option has its own costs and benefits, and the decision of which to pursue will depend on factors such as the age and condition of the turbines, the cost of repairs and upgrades, and the availability of financing and regulatory approvals.

Repowering of wind farms involves the process of replacing older and less efficient wind turbines with new and more effective ones. Existing infrastructure, including roads and grid connection equipment, is retained and reused where possible. New turbine foundations are usually required, and the layout and number of wind turbines normally changes. Dismantling wind farms can typically take 6 – 12 months but it can be possible to erect new turbines as old ones are taken away. Repowering wind farms involves returning to the start of the project lifecycle process, replacing components to increase installed capacity and performance. Repowering also reduces maintenance costs and extends the lifespan of the wind farm. Reasons why repowering of a wind farm may be desirable include the following;

PLANNING PERMISSIONS EXPIRING

The lifespan of wind farms is limited by their planning permissions. Developers may look to repower existing wind farms to extend the project's lifespan and renewable energy production beyond the original expiration date of a wind farm.

DEMAND FOR RENEWABLE ENERGY

As the demand for renewable energy continues to grow, wind farm operators are considering repowering as a viable approach to boost energy production capacity. By retrofitting existing wind farms with higher-capacity wind turbines repowering can help wind farms deliver more electricity in a more efficient and cost-effective manner. Replacing old turbines with modern units also improves integration into the electricity grid. State-of-the-art turbines are more efficient and reliable, allowing for greater control over power generation and distribution. This reduces the risk of power outages and ensures a smoother flow of electricity.

ECONOMIC VIABILITY

Wind turbines can experience a decline in efficiency over time, leading to diminished energy output. Older turbines may lack the efficiency and advanced features of newer models, limiting their potential. Eventually, these turbines will reach the end of their useful life. A decision will need to be made on whether to replace them with newer, more advanced models or to decommission the entire wind farm. With consistent technological advancements in wind turbine technology, repowering can be a feasible solution for achieving better efficiency and production capacity with the replacement of older turbines. Repowering results in fewer new turbines is likely to yield higher power output with less land use, making repowered projects more feasible and efficient. Furthermore, local communities familiar with wind farms are more likely to accept repowered projects in their areas.

It is estimated, according to the latest data from WindEurope, between 2023 and 2030, 83 GW of onshore wind power in Europe will reach 15 years of age. 70 GW is estimated to be extended, 7.8 GW decommissioned, and 5.6 GW repowered. They also note that the repowering of wind farms leads to a reduction of about 25% in the number of turbines but improves the wind farm's installed capacity and triples its electricity production.

Despite this clear advantage currently less than 10 % of wind turbines reaching the end of their useful life are being repowered, primarily as a result of slow and complex authorisation procedures³.

3 Repowering Ireland Analysis

MKO, one of Ireland's leading environmental consultancies, was recently commissioned by Wind Energy Ireland to undertake research on the planning considerations for the repowering of the existing, operational wind energy developments currently connected to the electricity network in Ireland.

Despite the emphasis on developing new wind farms to meet the binding renewable energy and climate action targets for 2030 and beyond to 2050, there had been no comprehensive industry-wide analysis assessing the potential loss of currently installed wind energy generating capacity from the Irish electricity system. The research had five distinct research tasks:

1. **Determining** the lifespan of planning permissions for operational wind farms to estimate the number of Megawatts (MW) that will be decommissioned in the coming years, in the absence of repowering.
2. **Analysing** spatial policies and planning obstacles for repowering existing wind farms based on local authorities' wind energy strategies.
3. **Assessing** the repowering potential of five reference wind farm projects to compare with current installed capacities.
4. **Reviewing** the draft wind energy planning guidelines (WEGs) to identify issues and opportunities relating to the repowering of existing wind farms.
5. **Identifying** challenges associated with repowering wind farms located within or adjacent to Special Protection Areas designated under the EU Birds Directive, and proposing a strategy aligned with EU directives and policies on the conservation and restoration of protected species, and the continued expansion of renewable energy.⁴

The key findings of this research were published in [Repowering Ireland: How we stay global leaders in onshore wind energy](#) and are summarised below

- **Planning Permission Durations** - The research found that of the 4,347 MW of wind farms connected by Q3 2023, 854 MW will have to be decommissioned by 2030 and 2,488 MW by 2040, unless they are repowered or have their planning permission lifetime extended.
- **Spatial Policy Analysis** - Despite being built in areas previously deemed suitable for wind energy development, only 65% of existing wind farms are currently located in favoured areas, while 26% are located in unfavoured areas, and 10% are in areas without any policy classification, which poses a challenge for their repowering potential.
- **Repowering Capacity Analysis** - A repowering capacity analysis of five sample wind farms showed that applying present-day design, planning and environmental constraints would result in a reduction of 35% in the installed capacity of the repowered projects, compared to the existing capacity.

³ Accessed Online: [End of life and repowering trends, and policy recommendations on repowering | WindEurope](https://windeurope.org/eolis2022/#:~:text=Eolis%202022%20highlights&text=A%20large%20part%20of%20Europe's,wants%20510%20GW%20by%202030), and <https://windeurope.org/eolis2022/#:~:text=Eolis%202022%20highlights&text=A%20large%20part%20of%20Europe's,wants%20510%20GW%20by%202030>.

⁴ MKO (2024), *Repowering Ireland – How we stay global leaders in onshore wind energy*

- **Wind Energy Guidelines** - The research reviews the current draft wind energy planning guidelines (WEGs) and highlights particular challenges associated with repowering existing projects where the current draft WEGs do not differentiate in any way between the design requirements for existing projects requiring life extension or repowering, and new greenfield projects.

Recommendations from the research include accommodating flexible noise and shadow flicker standards, eliminating the 4x tip-height setback for extension of life projects, and adopting a presumption in favour of granting planning permission for repowering and extension of life projects irrespective of local policy designations.

- **Repowering in SPAs** - The research highlights the particular challenges associated with the repowering of operational wind farm projects in Special Protection Areas (SPAs) designated under the EU Birds Directive for the protection of hen harriers. This is particularly relevant given the research established that there is 732 MW of wind energy generating capacity currently installed within the hen harrier SPAs, and a further 347 MW installed within five kilometres of these same SPAs.

The research also suggested a strategy for repowering wind farms in SPAs for hen harriers, which involves assessing the impacts on the conservation objectives of the SPAs and exploring the possibility of proceeding through the Imperative Reasons of Overriding Public Interest (IROPI) route, drawing on recent EU policies (REPowerEU/Renewable Energy Directive III) that classify renewable energy projects as being in the overriding public interest.

This research reveals that there is a combined and cumulative threat that could result in the potential loss of significant volumes of currently installed the Irish wind energy generating capacity.

The research established that:

- 854 MW will reach the end of their permitted lifespans or anticipated operating lives by 2030
- 1,569 MW does not currently have favourable planning policy support (not favoured + no classification),
- Existing wind farm projects could lose up to 35% of their current installed capacity when present-day planning, environmental and design constraints are applied,
- 1,080 MW is located in or within five kilometres of a Special Protection Area.

Overall, this research provides valuable insights into the planning considerations, challenges, and potential strategies for repowering Ireland's operational wind farms. The research's key findings and recommendations have, in turn, influenced the key considerations and recommendations of this position paper.

4 Key Issues to the Repowering of Existing Wind Farm Sites

The following section will identify the key issues that have been identified by the working group as the biggest challenges for the repowering, extension of life and extension of duration of existing wind farms, which are as follows:

- The draft Wind Energy Guidelines;
- Renewable Energy Directive;
- Repowering in Special Protection Areas (SPA's);
- Grid connections;
- Decommissioning of existing wind farms.

4.1 Draft Wind Energy Development Guidelines

4.1.1 Introduction

New draft Wind Energy Guidelines (WEGs) were first issued for public consultation in December 2019 and are an update to the 2006 Wind Energy Planning Guidelines, which were the subject of a “Focused Review” undertaken in 2013/14 in respect of noise, visual amenity setback and shadow flicker. At the time of writing, the draft WEGs have not yet been adopted and the 2006 guidelines remain in force.

The aim of the draft WEGs is to *“strike a better balance between addressing the concerns of local communities in relation to wind farm proposals, whilst maintaining Ireland’s ability to deliver on its binding energy policy obligations”*.

The prevailing view of our industry is that the draft WEGs did not achieve this with regards to the future management of Ireland’s existing wind energy projects.

The draft WEGs have the potential to pose a significant obstacle to repowering and extension of life planning applications on existing wind farm sites. The guidelines potentially introduce stricter noise limits, setback distances and shadow flicker requirements compared to standards in place when consent was originally granted for the wind farm.

4.1.2 Key Issues

Noise Guidelines

The proposed noise guidelines have the potential to cause significant issues for repowering projects. Neither extension of life projects nor repowering projects are explicitly addressed in the draft WEGs. It is understood that the noise aspects of the draft WEGs are undergoing further review.

Planning Policy

MKO’s repowering research shows that there are 110 wind farms, accounting for 36% of the existing wind energy generating capacity, that lack the necessary wind energy policy support for repowering or extension of life planning applications.⁵ There is a significant risk that these projects may not be repowered and may not secure planning permission due to a change in policy, despite being considered to be appropriate locations when first granted planning permission and making a significant contribution to the decarbonisation of the electricity system since first built.

⁵ MKO (2024), Repowering Ireland - Research on the planning considerations of repowering Ireland’s operational wind farms

Visual Amenity Setback

The draft WEGs stipulate a “4 times height to blade tip” setback from the nearest point of the curtilage of any residential property in the vicinity of a proposed wind farm. This is potentially a significant design constraint for extension of life planning applications for existing wind farms which were developed under different guidelines. In such cases, residential properties may have been constructed during the operational life of the wind farm closer to the operational turbines than would have been the case when the wind farm was first permitted and constructed.

Through no fault of the wind farm, it may not be possible to comply with the “x4” setback requirements in seeking to simply extend the operational life of the existing wind farm, if the draft WEGs had to be followed as currently drafted.

Residential properties built closer to the existing turbines since the wind farm was first built, were constructed by their owners with the wind turbines in plain sight. If the draft WEGs were to be implemented as currently drafted, more recently constructed properties in the vicinity of wind farms would prevent the permitted lifespan of the wind farm being extended.

Shadow Flicker

The draft WEGs have set a stringent zero shadow flicker mandate, along with requiring control and shutdown response regulations that, if implemented, could be the most severe throughout Europe.

On more modern turbines, it is possible to limit and/or prevent the occurrence of shadow flicker through the wind farm’s SCADA electronic control system, which can be programmed to shut down certain turbines in certain weather conditions likely to result in shadow flicker, for a limited period of time that shadows might be cast on nearby properties. Such shadow flicker control systems are relatively commonplace on modern turbines, but many of the earlier turbines installed in the 1990s, 2000s and early 2010s, would not have such control systems installed, and it may not be possible to install them retrospectively.

With it either being cost prohibitive or simply not possible to retrospectively install shadow flicker control systems on older wind farms, it may be impossible for them to comply with a zero-shadow flicker requirement if mandated by updated WEGs and conditioned as part of an extension of life planning permission application.

An older wind farm may have operated successfully for 20-25 years and without causing any significant incidence of shadow flicker at adjacent properties. It would be unnecessarily restrictive and punitive to place a zero-shadow flicker requirement on such wind farms, particularly where the properties have been constructed after the wind farm was installed.

Decommissioning of Existing Wind Farm Sites

Decommissioning of existing wind farm sites requires careful planning and execution to ensure safety, environmental protection, and compliance with regulations and agreements. It involves the removal, recycling, or disposal of turbines, foundations, cabling, and other infrastructure, as well as restoration of the site to its pre-construction state. It is estimated that there are approximately 34,000 turbines throughout Europe which are 15 years or older, representing 36 GW of onshore wind capacity. Out of the 36 GW some 9 GW are 20-24 years old and around 1 GW are 25 years or older. This highlights the number of projects and turbines that will require decommissioning over the next decade.⁶ For a detailed analysis of Ireland’s expected decommissioning numbers please see WEI’s [Repowering Ireland: How we stay global leaders in onshore wind energy](https://windeurope.org/intelligence-platform/product/decommissioning-of-onshore-wind-turbines/).

⁶ <https://windeurope.org/intelligence-platform/product/decommissioning-of-onshore-wind-turbines/>

With the rising significance of renewable energy, addressing waste linked to repowering initiatives will become more vital than ever. Effective management of the waste generated by such projects is essential to reduce their environmental impact. Clear standards for reusing, recycling and disposing of decommissioned wind turbines is required. Wind Europe published a report in 2020 that offers guidance on decommissioning of onshore wind turbines. The document provides high level information on decommissioning and dismantling steps for onshore wind farms.

4.1.3 Recommendations

WEI are requesting that the Department of Housing, Local Government and Heritage (DHLGH) incorporate provisions in the WEGs which take a flexible and pragmatic approach to repowering and extension of life applications and consider a more flexible approach on noise, visual amenity setback, and shadow flicker for these projects in light of their strategic importance to the 2030 targets. The following suggested amendments are proposed to the WEGs are supplementary to WEI's WEGs 2019 public consultation submission:

The updated WEGs should allow for individuals that lease/contribute their land to a wind farm project to agree to allowing higher noise and shadow flicker requirements for repowering and life extension projects. They could do this by entering into an agreement with the wind farm developer for such derogations.

- The updated WEGs should allow for existing wind farms to continue to operate under their existing noise thresholds where an extension of life is proposed and planning permission is sought to operate the wind turbines for a longer period than first permitted.
- The updated WEGs should remove the "x4 times height to blade tip" setback requirement for life extension projects and stipulate that the requirement for such projects would be to maintain current setback distances.
- Where houses and/or other properties were newly constructed closer to the wind farm since the wind farm was first granted planning permission, a different wind turbine setback requirement should apply in the updated WEGs.
- The updated WEGs should adopt a presumption in favour of granting permission for repowering or extension of life planning applications which lack the necessary wind energy policy support, despite being considered to be appropriate locations when first granted planning permission.
- Decommissioning of wind farms should be considered within the WEGs including environmental considerations, removal of above-ground equipment, site restoration. They should adopt a default position of allowing turbine foundations, roads, hardstands, and related infrastructure to remain post-decommissioning, as removing them is likely to give rise to a greater potential for environmental effects.

4.2 Renewable Energy Directive

4.2.1 Introduction

The Renewable Energy Directive is the EU legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since the introduction of the Renewable Energy Directive (RED) in 2009, it has undergone several revisions. In November 2023, a revision of the Renewable Energy Directive⁷ (RED III), came into force. RED III increases the EU wide renewable energy target from 32%, set under the previous revision of the directive, to 42.5%, with an ambition to reach 45% by 2030. The increase was proposed under the publication of REPowerEU plan in May 2022. The

⁷ Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast)

Directive also introduces specific targets for Member States in the industry, transport, and building (district heating and cooling) sectors.

Under RED III, EU member states must identify areas for the acceleration of renewables where projects will undergo a simplified and fast-track procedure. The deployment of renewables will also be of “*overriding public interest*” in order to limit the number of legal challenges on new renewable energy installations. These measures came in response to REPowerEU which found that permitting is the biggest bottleneck to deploying wind at scale, with approximately 80 GW of wind power capacity stuck in permitting procedures across Europe.

There is an 18-month period to transpose most of the directive's provisions into national law, with a shorter deadline of July 2024 for some of the provisions related to permitting for renewables, in particular Article 16(f) which establishes the legal presumption that the construction and operation of renewable energy development and storage assets are in the:

"overriding public interest and serving public health and safety when balancing legal interest in individual cases for the purposes of Article 6(4) and Article 16(1), point (c), of Directive 92/43/EEC [the 'Habitats Directive'], Article 4(7) of Directive 2000/60/EC [the 'Water Framework Directive'] and Article 9(1), point (a), of Directive 2009/147/EC.[the 'Birds Directive']".

4.2.2 Key Issues

Streamlining and speeding up the permitting process represents an opportunity to introduce meaningful change and improvements to the planning process in Ireland and will help reduce permitting timelines. The Government has yet to provide guidance on how the accelerated permitting timelines specified in the RED III directive will be integrated into the existing Irish permitting system. Additionally, the new Planning and Development Act does not make provision for these accelerated permitting timelines.

4.2.3 WEI Recommendations

WEI are calling for immediate engagement with the DHLGH on the following matters:

- The issuing of a ministerial direction to the Local Authorities and An Bord Pleanála by the DHLGH highlighting:
 - The requirements of EU Regulations in the context of repowering projects, including the 6-month permit consenting process.
 - Directing local authorities and An Bord Pleanála to adopt a presumption in favour of granting permission for repowering and extension of life projects.
 - In relation to RED III Directive, affirming that the construction and operation of renewable energy developments and storage facilities are considered to be in the *"overriding public interest."*
- Expedited delivery and establishment of a one-stop-shop for permitting and the digitisation of planning application submissions.

4.3 Repowering in Special Protection Areas

4.3.1 Introduction

There are particular challenges associated with the repowering of operational wind farm projects in Special Protection Areas (SPAs) designated for the protection of hen harrier under the EU Birds Directive. There is 732 MW of wind energy generating capacity currently installed within the hen harrier SPAs, and a further 347 MW

installed within five kilometres of these same SPAs. The repowering of operational wind farm projects in these SPAs presents a significant challenge.

The Habitats Directive permits EU member states to depart from the strict protection regimes afforded to protected sites if a project can prove that there are no viable alternatives available, and that it can demonstrate Imperative Reasons of Overriding Public Interest (IROPI). Article 6(4) outlines these requirements and allows member states to justify their departure from strict protection provisions.

Such derogations can only be granted in exceptional circumstances and must be subject to strict scrutiny to ensure that the objectives served by them are indeed of overriding public interest.

4.3.2 Key Issues

To achieve renewable energy targets, repowering or extension of life of wind farms within SPAs is crucial. Losing current capacity would hinder efforts to meet these goals, which are set by both national and European policy. It is therefore essential that measures are taken to ensure that the operation of existing wind farms within SPAs is maintained in a sustainable and responsible manner.

There is a lack of clear guidance from the DHLGH towards using the EU Habitats Directive Article 6(4) IROPI process for the delivery of renewable energy projects. Engagement with the National Parks and Wildlife Service (NPWS) is essential in agreeing on compensatory measures for an IROPI project. The NPWS's cooperation is crucial as the Minister for Housing, Local Government and Heritage holds the authority to make the final decision. Therefore, it is essential to involve the NPWS to ensure a successful project outcome in compliance with the regulatory framework.

The recent research by MKO has highlighted the complexities of repowering operational wind farms in Special Protection Areas (SPAs) designated for hen harrier conservation. The study reveals a conflicting balance between meeting renewable energy targets and restoring favourable hen harrier conservation status in SPAs. National and European policy sets ambitious targets for the expansion of renewable energy throughout Ireland and the EU and promotes the large-scale expansion of onshore wind energy. If the targets are to be met, the extension of life and/or repowering of existing wind farms both within and outside Ireland's SPAs will be critical.

The research suggests a strategy for repowering wind farms in SPAs for hen harriers, which involves assessing the impacts on the conservation objectives of the SPAs, and exploring the possibility of proceeding through the Imperative Reasons of Overriding Public Interest (IROPI) route, drawing on the recent EU policies that classify renewable energy projects as being in the overriding public interest.

The research provides a list of recommendations and considers that the repowering or extension of life of wind farms within and adjacent to SPAs that are designated for hen harriers can not only be achieved without resulting in adverse effects on those SPAs but can in fact contribute significantly to the conservation of the species both within and outside the SPA network. It would also contribute significantly and importantly to achieving the national renewable energy targets.

The research concludes that repowering wind farms in Special Protection Areas (SPAs) can significantly aid in restoring the favourable conservation status of hen harriers. Repowering wind farms within SPAs is not inherently incompatible with the achievement of favourable conservation status of hen harriers, but requires collaboration among stakeholders to balance energy and conservation objectives.

To achieve a mutually beneficial outcome, Government policy must clearly prioritise both biodiversity and renewable energy targets, ensuring the retention or repowering of existing wind farms while protecting hen harrier populations.

4.3.3 WEI Recommendations

WEI is calling for immediate engagement with the NPWS and the DHLGH on the following matters:

- For Repowering Projects, it would be beneficial for each development where the application of Article 6(3) has resulted in a negative outcome, to be presumed IROPI unless otherwise demonstrated. This would allow such applications to proceed via Article 6(4) process, allowing for meaningful compensation to be applied.
- The wind energy sector could assist in the delivery of strategic measures to conserve hen harriers within SPAs and elsewhere throughout the State. This could be done through the application of significantly funded, organised, monitored, strategic and collaborative actions to enhance hen harrier habitat both within and outside SPAs.
- The acceptance that that the repowering of wind farms within and adjacent to SPAs has the presumption of being of overriding public interest, unless otherwise proven on a case-by-case basis. This will require confirmation at a Government level to, in principle, facilitate the repowering of the existing wind farm projects located within or adjacent to the Irish SPAs, subject to the normal requirements of proper planning and sustainable development and ensuring that such projects do not result in adverse effects on the environment that cannot be mitigated or compensated for.
- Constructive engagement with the National Parks and Wildlife Service at both the local (project specific) and national (policy) levels. It will be necessary for the operators of existing wind farms to be aware of the likely actions that will be required from them to protect and conserve hen harriers at an early stage in planning the future of an existing wind farm project.
- In the absence of an integrated plan for the management of an SPA, typical measures that reflect the actions of the Hen-Harrier Threat Response Plan, and which are accepted as beneficial for hen harrier, could be compiled into a guidance document or 'tool kit' of compensation/enhancement measures. Such measures could then be implemented on a project-specific basis to deliver defined hen harrier conservation benefits from each wind farm repowering project.

5 Conclusions

Considering the current challenges that exist for the repowering and extension of life of existing wind farms, the Government targets are at risk of not being achieved without targeted and specific policy interventions.

As noted in *Repowering Ireland: How we stay leaders in onshore wind energy*, there is a combined and cumulative threat that could result in the potential loss of currently installed Irish wind energy generating capacity.

The research established that 854 MW will reach the end of their permitted lifespans or anticipated operating lives by 2030, 1,569 MW does not currently have favourable planning policy support, while existing projects could lose up to 35% of their current installed capacity when present-day planning, environmental and design constraints are applied and 1,080 MW is located in or within five kilometres of a Special Protection Area.

Streamlining and speeding up the permitting process presents a chance to bring about substantial improvements to the planning process in Ireland and reduce permitting timelines. The lack of guidance from the Government is a significant hurdle to the implementation of Renewable Energy Directive III⁸ that now

⁸ Accessed: [Directive - EU - 2023/2413 - EN - Renewable Energy Directive - EUR-Lex](#)

requires a 6-month consenting timeline for repowering projects. Urgent action is needed to ensure that the regulations are fully implemented without delay.

In addition, repowering existing capacity that is located in or is within close proximity of SPA's is vital to achieve renewable energy targets set by both national and European policy. Losing current capacity would impede efforts to meet these goals. Clear guidance is also required for renewable energy projects on how to navigate the EU Habitats Directive Article 6(4) IROPI process. The Government must actively facilitate the repowering of wind farms in SPA's using the mechanisms available in Article 6(4) of the EU Habitats Directive.

Decommissioning of existing wind farm sites requires careful planning and execution to ensure safety, environmental protection, and compliance with regulations and agreements. This should be reflected in the WEGs, which must consider environmental considerations, removal of above-ground equipment, site restoration. A default position should be adopted of allowing turbine foundations, roads, hardstands, and related infrastructure to remain post-decommissioning, as removing them is likely to give rise to a greater potential for environmental effects.

Repowering and extension of life of existing wind farms may also face significant challenges due to stricter noise limits, setback distances, and shadow flicker requirements under the WEGs which could lead to the abandonment of such projects. It is crucial that the DHLGH take a flexible and pragmatic approach to repowering and extension of life applications and consider less stringent guidelines on noise, visual amenity setback, and shadow flicker for these projects in light of their strategic importance to the 2030 targets.

The key actions and recommendations of this position paper are as follows:

Wind Energy Guidelines

- The updated WEGs should allow for individuals that contribute their land to the wind farm project to agree to higher noise and shadow flicker requirements for repowering and life extension projects. Higher noise and shadow flicker requirements should only be implemented if contributing parties have entered into an agreement with the wind farm developer for such derogations.
- The updated WEGs should allow for existing wind farms to continue to operate under their existing noise thresholds where an extension of life is proposed and planning permission is sought to operate the wind turbines for a longer period than first permitted.
- The updated WEGs should remove the "x4 times height to blade tip" setback requirement for life extension projects and stipulate that the requirement for such projects would be to maintain current setback distances.
- Where houses and/or other properties were newly constructed closer to the wind farm since the wind farm was first granted planning permission, a different wind turbine setback requirement should apply in the updated WEGs. Given the owner/occupier of such properties knowingly constructed or purchased the property after the wind farm was permitted and knew the distance their property would be from the closest wind turbine, the pre-existing turbine tip-height separation distance should continue to apply to any future repowered wind farm adjacent to such properties.
- The updated WEGs should adopt a presumption in favour of granting permission for repowering or extension of life planning applications which lack the necessary wind energy policy support, despite being considered to be appropriate locations when first granted planning permission.
- Decommissioning of wind farms should be considered within the WEGs including environmental considerations, removal of above-ground equipment, site restoration. They should adopt a default position of allowing turbine foundations, roads, hardstands, and

related infrastructure to remain post-decommissioning, as removing them is likely to give rise to a greater potential for environmental effects.

Renewable Energy Directive

WEI are calling for immediate engagement with the DHLGH on the following matters:

- The issuing of a ministerial direction to the Local Authorities and An Bord Pleanála by the DHLGH highlighting the requirements of EU Regulations in the context of repowering projects, including the 6-month permit consenting process.
- The issuing of a ministerial direction pertaining to the RED III Directive, affirming that the construction and operation of renewable energy developments and storage facilities are considered to be in the *"overriding public interest."*
- Directing local authorities and An Bord Pleanála to adopt a presumption in favour of granting permission for repowering and extension of life projects.

Repowering in Special Protection Areas

WEI are calling for immediate engagement with the NPWS and the DHLGH on the following matters:

- For Repowering Projects, it would be beneficial for each development where the application of Article 6(3) has resulted in a negative outcome, to be presumed IROPI unless otherwise demonstrated. This would allow such applications to proceed via the Article 6(4) process, allowing for meaningful compensation to be applied.
- The wind energy sector could assist in the delivery of strategic measures to conserve hen harrier within SPAs and elsewhere throughout the State. The wind energy sector has the potential to more than compensate for any negative effects it may be having on hen harrier through the application of significantly funded, organised, monitored, strategic and collaborative actions to enhance hen harrier habitat both within and outside SPAs.
- The acceptance that that the repowering of wind farms within and adjacent to SPAs has the presumption of being of overriding public interest, unless otherwise proven on a case-by-case basis. This will require confirmation at a government level to, in principle, to facilitate the repowering of the existing wind farm projects located within or adjacent to the Irish SPAs, subject to the normal requirements of proper planning and sustainable development and ensuring that such projects do not result in adverse effects on the environment that cannot be mitigated or compensated for.
- Constructive engagement with the National Parks and Wildlife Service at both the local (project specific) and national (policy) levels. It will be necessary for the operators of existing wind farms to be aware of the likely actions that will be required from them to protect and conserve hen harrier at an early stage in planning the future of an existing wind farm project.
- In the absence of an integrated plan for the management of an SPA, typical measures that reflect the actions of the Hen-Harrier Threat Response Plan, and which are accepted as beneficial for hen harrier, could be compiled into a guidance document or 'tool kit' of compensation/enhancement measures. Such measures could then be implemented on a project-specific basis to deliver defined hen harrier conservation benefits from each wind farm repowering project.

ENDS